United States Court of Appeals for the Second Circuit



APPENDIX

DRIGINAL

75-7297

(42178)

United States Court of Appeals

For the Second Circuit

PARENTS' COMMITTEE OF PUBLIC SCHOOL 19, et al., Plaintiffs-Appellees,

against

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT NO. 14, BOARD OF EDUCATION OF THE CITY OF NEW YORK and IRVING ANKER, as Chancellor

Defendants-Appellants,

and

TERREL H. BELL, Commissioner of the United States Office of Education,

Defendant.

On Appeal from Judgment and Order of the United States District Court for the Eastern District of New York

JOINT APPENDIX VOLUME I OF TWO VOLUMES

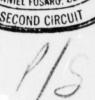
(Pages JA1 to JA313)

W. Bernard Richland,
Corporation Counsel,
Attorney for Defendants-Appellants
Board of Education and Irving Anker,
Municipal Building,
New York, New York 10007.
566-4510

Ira S. Bezoza, Esq.,
Patricia Vergata,
Williamsburg Legal Services,
260 Broadway,
Brooklyn, New York 11211.

Kenneth Kimerling, Esq.,
Herbert Teitelbaum,
Puerto Rican Legal Defense Fund,
95 Madison Avenue,
New York, New York 10016,
532-8470

Attorneys for Plaintiffs-Appellees.



JUN 19 1975

PAGINATION AS IN ORIGINAL COPY

TABLE OF CONTENTS

PAGE
Docket Entries JA 1
Complaint JA 10
Answer JA 28
Notice of Motion for Preliminary Injunction JA 38
Order of Judge Weinstein, August 20, 1974 JA 110
Affidavit of Irving Anker JA 112
Motion for Leave to File Supplemental Complaint and Serve Supplemental Summons JA 118
Affidavit of Norman Spiegel JA 124
Affidavit of Rosemary Carroll JA 185
Order of Judge Weinstein, December 11, 1974 JA 189
Supplemental Complaint JA 190
Answer to Supplemental Complaint by Defendants JA 224
Notice of Motion for Summary Judgment JA 240
Responses of Defendants to Plaintiffs' Second Interrogatories JA 314
Letter and Certification by Rosemary Carroll, March 20, 1975 JA 371
Response of District 14 to Interrogatory 19 of Plain- tiffs' Second Set of Interrogatories JA 375

	F & GE
Defendant's Answers to Interrogatories	JA 386
Notice of Cross-Motion	JA 398
Transcript of Proceedings—April 18, 1975	JA452-1
Notice of Motion	JA 453
Supplementary Affidavit of Patricia Vergata	
Affidavit of Rabbi Albert Friedman	JA 502
Affidavit of Rabbi Naftali H. Frankel	JA 507
Affidavit of Lawrence F. Larkin	JA 512
Affidavit of Sister Filippa Anne Luciano	JA 516
Affidavit of Kenneth Kimerling	
Transcript of Preceedings-May 9, 1975	JA 520
Affidavit of Michael S. Cecere	
Affidavit of Anthony J. Polemeni	
Transcript of Proceedings-May 19, 1975	JA 545
Oregran Tudge Weinstein, May 19, 1974	
Notice of Appeal by Defendants	
Second Supplemental Complaint	
Transcript of Proceedings—May 23, 1975	

Docket Entries

DATE	FILINGS—PROCEEDINGS
5-22-74	Complaint filed. Summons issued.
5-22-74	Clerk's order allowing for personal service of summons and complaint filed.
5-29-74	Summons retd and filed—executed.
6-21-74	By Weinstein, J.—Order dated 6/20/14 filed that the time for the deft to answer the complaint is extended to 6/25/74.
7- 1-74	Pltffs' first interrogatories and request for production filed.
7- 1-74	By Weinstein, J.—Order dtd 7-1-74 extending time of defts to answer complaint to 7-15-74 filed.
7- 9-74	Notice to take deposition of Dr. August Gold file
7-24-74	Answer filed.
7-25-74	Pltffs' First Interrogatories and Request for Production of Documents served on defts Board of Education, Lachman, Monserrat, Robinson, Regan, Barkan and Anker filed.
8- 5-74	Notice of Motion, ret. 8/15/74 filed re: for a determination of a class pursuant to Rule 23.

Memorandum in Support of Pltff's motion to de-

Memorandum in Support of Motion for Prelimi-

termine a class pursuant to Rule 23 filed. 8- 5-74 Notice of Motion, ret. Aug. 15, 1974 filed re: for

a preliminary injunction.

nary Injunction filed.

8- 7-74 Pltff's memo of law filed.

8- 5-74

8- 5-74

	FILINGS—PROCEEDINGS
DATE	
8- 8-74	Memorandum in support of motion for preliminary injunction filed.
8-15-74	Before Weinstein, J.—Case called. Hearing on pltff's motion for preliminary injunction ordered, hld, & concluded. Motion for class action granted.
8-20-74	By Weinstein, J.—Order dtd 8-20-74 preliminarily enjoining defts from transferring any students, etc. filed.
8-23-74	Letter from Kenneth Kimerling dtd 8-5-74 filed.
8-27-74	Stenographer's transcript dtd 8-15-74 filed.
9-23-74	Plan for Remedial and Compensatory Education for Students at P.S. 19 filed.
9-23-74	Affidavit of Ira S. Bezoza in opposition to the defts plan submitted to this court filed.
9-23-74	Pltffs' Critique of deft's plan and pltffs' proposal for compensatory and remedial education filed.
9-24-74	Letter from Rosemary Carroll with order annexed thereon filed.
9-26-74	Letter of Ira Bezoza to Judge Weinstein dtd 9-23-74 re: memorandum submitted to Court 9-23-74 filed.
10- 2-74	Letter dated Aug. 29, 1974 filed from P. Vergata to Mr. Rogers.
10- 7-74	Reply of the Community School District filed.
10- 7-74	By Weinstein, J.—Order dtd 10-7-74 directing Clerk to inform parties that they may arrange for a conference by calling chambers filed on back of document #24. (copies mailed to attys).

Docket Entries

DATE

FILINGS-PROCEEDINGS

10-10-74	Before Weinstein, J.—Case calle l. Hearing ordered for discussion of plans spinnited. Hearing begun and concluded. Parties ordered to report in 30 days. Other directions read into record.
10-23-74	Letter dated Oct. 17, 1974 filed from N. Spiegel to J. Weinstein filed.
10-23-74	By Weinstein, J.—Order undated that in evaluating the bona fides of the attached application, the court will compare it with the request and supporting data for the award of \$461,231.00, etc. (on document #25) Copies sent to the attys.
11-21-74	Notice of motion ret 12-6-74 for an order granting pltffs' leave to file & serve a supplemental complaint on Terrell i ¹ . Bell, etc. & memo in support of motion filed.
12- 2-74	Copy of letter dated 11/27/74 filed from R. Carroll to J. Weinstein.
12- 2-74	Copy of letter dated 10/31/74 filed from J. Fein gold to E. Keesee.
12- 2-74	Copy of letter dated 11/20/74 filed from R. Carroll to J. Weinstein.
12- 2-74	Answer of Irving Anker filed.
12- 5-74	Copy of letter dated 10/23/74 filed from 5. Wein stein to H. Levine.
12-6-74	Stenographer's transcript of 10/10/74 filed.
12- 6-74	Before Weinstein, J.—Case called—Pltffs' motion for leave to file supplemental complaint an serve suppl. summons adjd to 12/11/74.
12-10-74	Pltffs' reply memorandum in support of motio for leave to file supplemental complaint filed.

Docket Entries

FILINGS-PROCEEDINGS DATE 12-11-74 Before Weinstein, J.—Case called for hearing on pltffs' motion for leave to file supplemental complaint & serve supplemental summons. Motion argued & granted. City has 30 days to answer and govt has 60 days from date of service. By Weinstein, J.—Order dtd 12-11-74 that pltffs' 12-12-74 be given leave to file supplemental complaint, etc. filed. Copy of letter from Elizabeth Keesee dtd 11-27-12-13-74 74 filed. Supplemental Complaint Class Action filed. Sup-12-13-74 plemental Summons issued. Clerk's Order appointing a Howard Shorter to 12-13-74 serve process of the Supplemental Summons and Complaint on the deft, Terrel H. Bell filed. Affidavit of Norman Spiegel filed. 12-13-74 Affidavit of Rosemary Carroll in Opposition to 12-13-74 pltffs' motion for leave to serve a supplemental summons and complaint filed. Affidavit of P. Vergata appointing Howard 12-13-74 Shorier to serve Supplemental Summons and complaint upon deft Adrian Burke filed. Defts' Memorandum of Law filed. 12-13-74 Letter dtd 12-17-74 to Rosemary Carroll from 12-23-74 Patricia Vergata re Williamsburg Early Childhood Center filed. 1- 7-75 Letter dated 1/6/75 filed from R. Carroll to Ms. Vergata.

DATE	FILINGS-PROCFEDINGS
1- 8-75	Letter dtd Jan. 7, 1975 to J. Weinstein from Patricia Vergata filed.
1- 8-75	Affidavit of Patricia Vergata filed.
1-14-75	Letter dated $1/10/75$ filed from R. Carroll to J. Weinstein.
1-14-75	Pltffs' Second Interrogatories to defts Community School Board and the Members thereof and William Rogers filed.
1-14-75	Affidavit of Service of summons and complaint filed.
1-14-75	Copy of letter dated 1/6/75 filed from R. Carroll to Ms. Vergata.
1-16-75	By Weinstein, J.—Order dtd 1-10-75 directing defts' to allow pltffs to have access to evaluation of remedial and compensatory education program filed.
1-16-75	Affidavit of John J. Towers, Jr. filed.
1-21-75	Affidavit of Service filed.
1-24-75	Letter dated 1/23/75 filed from R. Carroll to Ms. Vergata.
2- 4-75	Copy of letter dated 1/30/75 filed from I. Bezoza to Ms. Carroll.
2-11-75	Pltffs' First Interrogatories to Deft Commissioner of the U.S. Office of Education filed.
2-11-75	Pltffs' Request for Production of Documents filed.
2-18-75	Pltffs' request to enter default filed.
9 19 75	Letter from Resemany Carroll dtd 2-13-75 filed

Docket Entries

DATE	FILINGS-PROCEEDINGS
2-18-75	By Weinstein, J.—Gerer dtd 2-14-75 denying motion for a default purgment filed on document #59. (p/c mailed to arrys).
2-20-75	Letter from Patricia Vergata dtd 2-13-75 filed.
2-20-75	By Weinstein, J.—Order dtd 2-18-75 that unless counsel for defts show cause within 5 days, pltffs are to be permitted access to observe programs in operation, etc. filed. (on document #60).
2-21-75	Letter from Ira S. Bezoza dtd 2-19-75 filed.
2-21-75	By Weinstein, J.—Order dtd 2-20-75 denying motion to reconsider denial of request for default filed on document #61.
2-24-75	By Weinstein, J.—Order dated 2/21/75 filed that the time for Fed. Defts' to answer the complaint is extended to 3/10/75.
2-24-75	Answer filed.
2-25-75	Letter from R. Carroll to J. Weinstein filed (dated 2/20/75)
2-26-75	By Weinstein, J.—Order dated 2/25/75 filed that pltffs' expert shall be allowed to visit one fourt grade diagnestic mathematics class, etc.
3- 1-75	Letter from Herbert Teitelbaum of the Puert Rican Legal Defense & Eduction Fund re chang of address filed.
3- 7-75	Notice of Motion for summary judgment re 3-10-75 for an order dismissing the complain filed.
3- 7-75	Answer filed.
0.10.75	Defens Weinstein I Case called Motion ad

to 3/25/75.

DATE	FILINGS—PROCEEDINGS
3-12-75	Letter from Rosemary Carroll dtd 3-10-75 filed.
3-12-75	By Weinstein, J.—Order dtd 3-11-75 adjourning motion for summary judgment to 3-25-75 filed on document #69.
3-17-75	Notices to take deposition of Hyman Frankel & Filippa Anne Luciano filed.
3-19-75	By Weinstein, J.—Order dtd 3-17-75 extending time of federal defts' to answer pltffs' first interrogatories to 3-28-75 filed.
3-24-75	Letter of Ira S. Bezoza to Judge Weinstein dtd 3-20-75 re: motion for summary judgment filed
3-24-75	By Weinstein, J.—Order dtd 3-21-75 adjing motion for summary judgment to 4-11-75 filed or document #73.
4- 3-75	Defts' answers to interrogatories filed.
4-10-75	Letter of Ira S. Bezoza to Judge Weinstein dto 4-9-75 re: adjing motion for summary judgmen to 4-18-75 filed.
4-10-75	By Weinstein, J.—Order dtd 4-9-75 adjing motion for summary judgment to 4-18-75 filed ordocument #75.
4-16-75	Notice of cross motion ret 4-18-75 for an orde pursuant to Rule 56 (e) filed.
4-16-75	Memo of Law filed.
4-16-75	Notice of motion to enforce order of 8-20-74 red-18-75 filed.
4-16-75	Pltffs' memo in support of motion to enforce order filed.
4-16-75	Report of Isaura Santiago filed.

DATE	FILINGS—PROCEEDINGS

- 4-18-75 Before Weinstein, J.—Case called. Parties to look at papers for application by defts for summary judgment. Motion adj'd to 5-9-75 at 9:30 A.M.
- 4-21-75 Letter dtd 4-16-75 to J. Weinstein from Rosemary Carroll filed.
- 4-22-75 Notice of Motion, ret. 5/9/75 filed re: granting defts' motion for summary judgment against the pltff, etc.
- 4 22-75 Memorandum in Support of Deft Bell's Motion for Summary Judgment filed.
- 4-28-75 Letter from Rosemary Carroll dtd 4-23-75 filed.
- 5- 6-75 Supplementary Affidavit of Patricia Vergata filed.
- 5-6-75 Memorandum in Opposition to Federal Defts Motion for Summary Judgment filed.
- 5- 6-75 Notice of Motion, ret. 5/16/75 filed re: class action.
- 5- 6-75 Memorandum in Support of Pltffs' motion to determine a class pursuant to Rule 23 filed.
- 5- 6-75 Affidavit of Kenneth Kimerling filed.
- 5- 9-75 Before Weinstein, J.—Case called—Defts' motion for summary judgment argued—Court orders that the District Administer the Aspira test; pltffs' to submit order to that effect (If any administration difficulties, further application can be made)—Motion to enforce the August 20th Order adjd to 5/22/75—City defts to file briefs by 5/19/75—Decision reserved on summary judgment—Motion until after Aspira test is administered—So ordered.

DATE	FILINGS—PROCEEDINGS
5-15-75	Letter dtd 5-12-75 to J. Weinstein from Michael S. Cecere filed.
5-15-75	By Weinstein, J.—Order dtd 5-14-75 granting stay pending hearing on 5-19-75 on the bottom of document #90.
5-19-75	Before Weinstein, J.—Case called. Pltffs motion re class action argued. Court signs modification of order submitted by pltffs. Leave granted to file supplemental complaint within five days. Class action motion adj'a to 6-6-75.
5-20-75	Affidavit of Anthony J. Polemeni filed.
5-20-75	Affidavit of Michael S. Cecere in opposition to request to Administer Aspira, etc. filed.
5-20-75	By Weinstein, J.—Order dtd 5-19-75 granting pltffs' motion to administer LAB test in the non-public parochial schools, etc. filed. (p/c mailed to attys).
5-20-75	Notice of appeal filed. Copy sent to C of A/JN.
5-21-75	Notice of motion before Second Circuit filed.
5-21-75	Evaluation of Implementation & Effectiveness etc. filed.
5-21-75	Affidavit of William A. Rogers filed.
5-71-75	Affidavit of Leonard Koener filed. (Copy 2nd Cir.)
5-22-75	Above record certified & mailed to C of A.
5-22-75	Before Weinstein, J.—Case called and adj'd to 6-5-75.
5-23-75	Second supplemental complaint filed.

Complaint

۱	Complete	
-	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK	JA 10
-	PARENTS' COMMITTEE OF PUBLIC SCHOOL 19,	:
	ANA DECOS, individually and on behalf of her minor child ALEXANDER,	:
	MARIA GARCIA, individually and on behalf of her minor children SYLVIA, JOSE, LUIS and MATILDE,	
	ANA PEREZ, individually and on behalf of her minor child ANNETTE CORTEZ,	:
	ROSA RENTAS, individually and on behalf of her minor children JOSE MUNETT, RAMON VEGA, and	
	SARA VEGA, SONIA ACOSTA, individually and on behalf of her minor child DAVID,	: COMPLAINT CLASS ACTION
	NORMA ALVARADO, individually and on behalf of her minor children ELIZABETH, JENNY, OLGA and IRIS,	
	MARIA CABRERA, individually and on behalf of her minor child WAKESCA GELABERT,	
	MIGUELERIA CENTENO, individually and on behalf of her minor children JOHNNY and RUBEN,	·;
	NEREIDA COLON, individually ard on behalf of her minor children DANNY and REYNALDO,	:
	MARIA ESTERES, individually and on behalf of her minor child MARIBEL,	
	ANA LOPEZ, individually and on behalf of her minor children RENE and ANA,	:
	MARY MALDONADO, individually and on behalf of her minor children LISSETTE and MADLINE,	:
	MARIA MARQUEZ, individually and on behalf of her minor child CARMEN.	
	DAISY MUNIZ, individually and on behalf of her minor child DAISY,	,
	(continued next page)	x

LYDIA OTERO, individually and on behalf of her minor chldren ERIC and MERVIN,

ROSA PAGAN, individually and on behalf of her minor children DINO, RAMON and WANDA,

GEORGINA PEREZ, individually and on behalf of her minor child LUZ ENEIDA MOLINA,

ANA RAMOS, individually and on behalf of her minor children MARIA RONDON and LUZ RONDON,

MANUELA RAMOS, individually and on behalf of her minor child RICHARD,

NATIVIDAD RESTO, individually and on behalf of her minor children WANDA RIVERA and LYDIA RESTO,

AURORA RIVERA, individually and on behalf of her minor children DORIS and JIMMY,

MERCEDES RIVERA, individually and on behalf of her minor children JACQUELINE, CARMETO and RAFAEL,

CARMEN RODRIGUE", individually and on behalf of her minor children EFRAIN and MAYRA,

REINA RODRIGUEZ, individually and on behalf of her minor children LOILA and JOSE NUNEZ,

SARAH RODRIGUEZ, individually and on behalf of her minor child LIZZETTE,

"ICTORIA RODRIGUEZ, individually and on behalf of her minor children DIANE and CHARLES,

CARMEN SANTIAGO, individually and on behalf of her minor child LIZETTE, :

MIRIAM SULSONA, individually and on behalf of her minor child SHIRLEY MORALES,

ANTOLINA TRINIDAD, individually and on behalf of her minor children LUIS and MARIA,

CANDIDA VASQUEZ, individually and on behalf of her minor children WILMA, ADALENA, BENITO and JANET, and all others similarly situated,

Plaintiffs,

-against-

(continued next paged)

THE COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT No.14 OF THE CITY OF NEW YORK,

BROTHER ROBERT F. LALLY,
THOMAS STROHMENGER, ANGEL L. REYES,
RABBI LEOPOLD LEFKOWITZ, JOSEPH BONOMO:
PETER DELLAIACONO, LEROY FREDERICKS,
ROMAN A.MIZGALSKI and LUISA RIVERA,
individually and in their official
capacity as members of the Community:
School Board of Community School
District No. 14 of the City of:
New York,

WILLIAM ROGERS, individually and in his official capacity as Community School District Superintendent of Community School District No. 14,

THE BOARD OF EDUCATION OF THE CITY OF NEW YORK,

SEYMOUR P. LACHMAN, JOSEPH MONSERRAT, ISAIAH E.ROBINSON, JR., JAMES F. REGAN: and JOSEPH G. BARKAN, individually and in their official capacity as: members of the Board of Education of the City of New York,

IRVING ANKER, individually and in his official capacity as Chancellor of the City School District of the City of New York,

Defendants,

I

JURISDICTION

parents on behalf of their minor children, students at Public School 19, who effectively receive one day per week less educational instruction than other children in the New York City public elementary schools due to the defendants' continued and systematic maintenance of split session classes. Plaintiffs and the class they represent are being discriminated against under color of law on the basis of race, color and national origin in violation of

the First and Fourteenth Amendments to the United States Constitution, Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d and 42 U.S.C. §1983, and seek declaratory and injunctive relief to redress the deprivation of their right to an equal educational opportunity.

2. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. \$1343 (3) and (4). Declaratory relief is appropriate pursuant to 28 U.S.C. \$201 and 2202.

II

PARTIES

- 3. Plaintiff PARENTS' COMMITTEE OF PUBLIC SCHOOL 19 is an association of Puerto Rican parents whose children attend Public School 19. The PARENTS' COMMITTEE OF PUBLIC SCHOOL 19 seeks to assure equality of educational opportunity for Hispanic children in Public School 19 and Community School Discrict No. 12 and to combat discrimination on the basis of race, color and national origin.
- 4. Plaintiffs ANA DECOS and her minor child, ALEXANDEE, age 6, are Puerto Rican and reside at 332 Keap Street, Brooklyn, New York. ALEXANDER attends kindergarten at Public School 19.
- 5. Plaintiffs MARIA GARCIA and her minor children SYLVIA, JOSE, LUIS and MATILDE, ages 5, 7, 8 and 9, are Puerto Rican and reside at 376 Hooper Street, Brooklyn, New York. SYLVIA JOSE, LUIS and MATILDE attend kindergarten, first, second and third grades respectively at Public School 19.
- 6. Plaintiffs ANA PEREZ and her minor child ANNETTE CORTEZ, age 10, are Puerto Rican and reside at 279 South First Street, Brooklyn, New York. ANNETTE attends and is repeating the fourth grade at Public School 19.

- 7. Plaintiffs ROSA RENTAS and her minor children, JCCE MUNETT, RAMON VEGA, and SARA VEGA, ages 7, 8 and 11 respectively, are Puerto Rican and reside at 385 South Fourth Street, Brooklyn, New York. JOSE, RAMON and SARA, attend the first, second and fourth grades, respectively, at Public School 19. JOSE had to repeat the first grade.
- 8. Plaintiffs SONIA ACOSTA and her minor child DAVID, age 6, are Puerto Rican and reside at 374 South Second Street, Brooklyn, New York. DAVID attends kindergarten at Public School 19.
- 9. Plaintiffs NOR. A ALVARADO and her minor children ELIZABETH, JENNY, OLGA and IRIS, ages 6, 7, 8, 9 respectively, are Puerto Rican and reside at 353 South 5th Street, Brooklyn, New York. ELIZABETH, JENNY, OLGA and IRIS attend kindergarten, first, third and fourth grades, respectively, at Public School 19.
- 10. Plaintiffs MARIA CABRERA and her minor child WAKESCA GELABERT, age 5, are Puerto Rican and reside at 324 South 4th Street, Brooklyn, New York. WAKESCA attends kindergarten at Public School 19.
- JOHNNY and RUBEN, ages 10 and 13 respectively, are Puerto Rican and reside at 294 Union Avenue, Brooklyn, New York. JOHNNY attends third grade at Public School 19. RUBEN attends and is repeating sixth grade at Public School 17.
- DANNY and REYNALDO, ages 6 and 7 respectively, are Puerto Rican and reside at 350 Keap Street, Brooklyn, new York. DANNY and REYNALDO attend kindergarten and second grade, respectively, at Public School 19.

- MARIBEL, age 5, are Puerto Rican and reside at 364 Hooper Street,
 Brooklyn, New York. MARIBEL attends kindergarten at Public School
- 14. Plaintiffs ANA LOPEZ and her minor children RENE and ANA, ages 7 and 12 respectively, are Puerto Rican and reside at 344 South 4th Street, Brooklyn, New York. RENE and ANA attend the first and fifth grades, respectively, at Public School 19.
- 15. Plaintiffs MARY MALDONADO and her minor children, LISSETTE and MADLINE, ages 6 and 7, respectively, are Puerto Rican and reside at 378 Hooper Street, Brooklyn, New York. LISSETTE and MADLINE attend kindergarten and first grade, respectively, at Public School 19.
- 16. Plaintiff MARIA MARQUEZ and her minor child CARMEN, age 6, are Puerto Rican and reside at 346 South 3rd Street, Brooklyn, New York. CARMEN attends the first grade at Public School 19.
- 17. Plaintiffs DAISY MUNIZ and her minor child DAISY, age 6, are Puerto Rican and reside at 316 South 1st Street, Brookly.

 New York. DAISY attends the first grade at Public School 19.
- and MERVIN, ages 8 and 11 respectively, are Puerto Rican and reside at 415 South 4th Street, Brooklyn, New York. ERIC and MERVIN attend the third and fifth grades, respectively, at Public School 19.
- 19. Plaintiffs ROSA PAGAN and her minor children,
 DINO, RAMON andWANDA, ages 8, 10 and 11, respectively, are Puerto
 Rican and reside at 368 South 3rd Street, Brooklyn, New York.
 DINO,RAMON and WANDA attend the third, fourth and fifth grades,
 respectively, at Public School 19.

- 20. Plaintiffs GEORGINA PEREZ and her minor child LUZ ENEIDA MOLINA, age 5, are Puerto Rican and reside at 322 Rodney Street, LUZ ENEIDA attends kindergarten at Public School 19
- 21. Plaintiffs ANA RAMOS and her minor children, MARIA RONDON and LUZ RONDON, ages 5 and 6 respectively, are Puerto Rican and reside at 262 South 1st Street, Brooklyn, New York. MARIA and LUZ attend kindergarten and first grade, respectively, at Public School 19.
- 22. Plaintiffs MANUELA RAMOS and her minor child, RICHARD, age 6, are Puerto Rican and reside at 374 South 2nd Street, Brooklyn, New York. RICHARD attends first grade at Public School 19.
- 23. Plaintiffs NATIVIDAD RESTO and her minor children, WANDA RIVERA and LYDIA, ages 5 and 12 respectively, are Puerto Rican and reside at 359 South 2nd Street, Brooklyn, New York. WANDA and LYDIA attend kindergarten and fifth grade, respectively, at Public School 19.
- 24. Plaintiffs AURORA RIVERA and her minor children, DORIS and JIMMY, ages 6 and 11 respectively, are Puerto Rican and reside at 340 South 3rd Street. DORIS and JIMMY attend the first and fifth grades, respectively, at Public School 19.
- JACQUELINE, CARMELO and RAFAEL, ages 6, 8, and 9 respectively, are Puerto Rican and reside at 340 South 3rd Street, Brooklyn, New Yor JACQUELINE, CARMELO AND RAFAEL attend kindergarten, second and third grades, respectively, at Public School 19.
- 26. Plaintiffs CARMEN RODRIGUEZ and her minor children EFRAIN and MAYRA, ages 7 and 11 respectivel, are Puerto Rican and reside at 380 Hooper Street, Brooklyn, New York. EFRAIN and MAYRatend first and fifth grades, respectively, at Public School 19.

- 27. Flaintiffs REINA RODRIGUEZ and her minor children LOILA and JOSE NUNEZ, age 9 and 10 respectively, are Puerto Rican, and reside at 381 Hooper Street, Brooklyn, New York. LOILA and JOSE attend the second and third grades, respectively, at Public School 19.
- 28. Plaintiffs SARAH RODRIGUEZ and her minor child, LIZZETTE, age 6, are Puerto Rican and reside at 415 Grand Street, Brooklyn, New York. LIZZETTE attends kindergarten at Public School 19.
- 29. Plaintiffs VICTORIA RODRIGUEZ and her minor children DIANE and CHARLES, ages 5 and 6 respectively, are Puerto Rican and reside at 322 Rodney Street, Brooklyn, New York. DIANE and CHARLES attend kindergarten and first grade at Public School 19.
- 30. Plaintiffs CARMEN SANTIAGO and her minor child,
 LIZETTE, age 5, are Puerto Rican and reside at 331 Keap Street
 Brooklyn, New York. LIZETTE attends kindergarten at Public School
 19.
- 31. Plaintiffs MIRIAM SULSONA and her minor child SHIRLEY MORALES, age 5, are Puerto Rican and reside at 272 South 5th Street, Brooklyn, New York. SHIRLEY attends kindergarten at Public School 19.
- 32. Plaintiffs ANTOLINA TRINIDAD and her minor children LUIS and MARIA, ages 6 and 10 respectively, are Puerto Rican and reside at 465 Grand Street, Brooklyn, New York. LUIS and MARIA attend the first and fifth grades, respectively, at Public School 19.
- 33. Plaintiffs CANDIDA VASQUEZ and her minor children WILMA, ADALENA, BENITO and JANET, ages 5, 9, 11 and 12 respective are Puerto Rican and reside at 353 South 5th Street, Brooklyn, New York. WILMA and ADALENA attend kindergarten and the fourth grade, respectively, at Public School 19. BENITO and JANET atterthe sixth grade at Public School 17. JANET had to repeat the fourth grade.

- No. 14 of the CITY OF NEW YORK and, its members BROTHER ROBERT P.
 LALLY, THOMAS STROHMENGER, ANGEL L. REYES, RABBI LEOPOLD LEFKOWITZ
 JOSEPH BÖNOMO, PETER DELLAIACONO, LEROY FREDERICKS, ROMAN A.
 MIZGALSKI, LUISA RIVERA, who are sued individually and in their
 official capacity as members of the school board of Community
 School District No. 14, share responsibility for the administration
 and operation of public elementary schools (New York State Education Law §2590-e) within the Williamsburg-Greenpoint Section of
 Brooklyn.
- 35. Defendant WILLIAM ROGERS, who is sued individually in his official capacity and/as the Community School District Superintendent of Community School/No. 14, shares the responsibility for the administration and operation of the public elementary schools within District No. 14 (New York State Education Law §2590-f).
- 36. Defendants THE BOARD OF EDUCATION OF THE CITY OF NEW YORK and its members SEYMOUR P. LACHMAN, JOSEPH MONSERRAT, ISAIAH E. ROBINSON, JR., JAMES REGAN and JOSEPH G. BARKAN, who are sued individually and in their official capacity as members of the Board of Education of the City of New York, share responsibility for the operation and administration of public elementary schools in New York City and have the specific enumerated duty to approve curriculum requirements of elementary schools (New York State Education Law §2590-g).
- and in his official capacity as chancellor of the New York City. School district shares responsibility for the operation and administration of public elementary schools and has the specific enumerated power of promulgating and approving minimum educational standards and curriculum requirements. (New York State Education Law \$2590-h.)

CLASS ACTION ALLEGATIONS

- (a) and (b)(2) of the Federal Rules of Civil Procedure on behalf of themselves and all other persons similarly situated. The class consists of Puerto Rican and other Hispanic (hereinafter the term Puerto Rican shall include Hispanic) parents and their minor children who are, will be or have been on split-session classes at Public School 19 and as a result are, will be or have been deprived of an equal educational opportunity on the basis of race color and national origin.
- 39. The class is so numerous that joinder of all member is impracticable. It is impossible to specify the exact number is persons in the class as a whole, but for the 1973-1974 school yes over fourteen hundred (1400) children were enrolled in the elementary school attending kindergarten through fifth grade.
- the interests of the class in this action for declaratory and injunctive relief. Each parent, suing individually and on behalf of their minor children, has a child or children attending Public School 19 who is effectively, or will effectively receive or has effectively received one day less per week of educational instrution than children at other public elementary schools due to defendants continued and systematic maintenance of split-session classes. The plaintiffs' claims are typical of the claims of the other members of the class. The defendants have acted or refuse to act on grounds generally applicable to the class there by make appropriate final declaratory and injunctive relief.

41. The questions of law and fact common to the class include the following:

maintenance of split-session classes effectively resulting in one day per week less educational instruction at Public School 19, than at other public elementary schools, without any state justification for said deprivation, discriminates against plaintificant on the basis of race, color and national origin in violation of the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution, Title VI of the Civil Rights Act of 1964, 42 U.S.C. Section 2000d, and 42 U.S.C Section 1983.

B. Whether defendants' maintenance or splitsession classes effectively resulting in one day per week less
educational instruction at Public School 19 with an enrollment of
many Puerto Rican children with English language disabilities,
deprive plaintiffs and their class of the full enjoyment of the
rights secured by the First and Fourteenth Amendments to the
United States Constitution?

violations of rights secured to plaintiffs and the class they represent under the Constitution and the laws of the United States

IV

STATEMENT OF CLAIM

42. Public School 19, originally built in 1911, located at Keap, Rodney and South Third Streets, is one of twenty-one (21) elementary schools which comprise Community School

District No. 14 in the Williamsburg-Greenpoint section of Brooklyn

building is approximately eleven hundred (1100) children. Public School 19 has a 1973-1974 school year enrollment of over fourteen hundred (1400) children in classes kindergarten to the fifth grade

44. Public School 19 presently has a student population

which is composed of over ninety-five percent (95%) Puerto Rican children. This is the greatest concentration of Puerto Rican students in percentage terms and absolute numbers of any of the public elementary schools in Community School District No. 14, and in percentage terms, in the entire New York City School District encompassing all thirty two (32) community school districts.

- 45. For many years Public School 19 has exhibited a pattern of recial and ethnic imbalance and has consistently maintained an enrollment which is predominantly Puerto Rican.
- 46. Overutilization of Public School 19 has been a persistent problem for the past fifteen years. Since the 1961-1962 school year, classes in the first, second and third grades have been forced to attend split-session classes.
- 47. For the 1973-1974 school year, first, second and third grades except for four third grade classes continue to operate on split sessions. There are cleven first grade classes, nine scond grade classes and ten third grade classes with approximately twenty-five children in each class.
- 48. Split-session classes incorporate a morning session from 7:45 A.M. to 12:00 P.M. and an afternoon session from 12:00 P.M. to 4:00 P.M. Fourth and fifth grade classes at Public School 19 attend a full day, 8:45 A.M. to 3:00 P.M., which is the normal schedule for full time students in the New York City School Distri
- 49. Thus, split-session classes limit plaintiffs to only 4 (four) hours of daily educational instruction as opposed to the 5 (five) hours of instruction received by other elementary school students. The effect of defendants' practice is to cause per week plaintiffs to receive one day less/educational instruction than that received by other public elementary school students.
- 50. The defendant Board of Education has required class receiving less than 5 (five) daily hours of education to receive special approval from the defendant looker or defendant Rogers (NI Board of Education By-Laws §77[2].)

- 51. The defendants have excercised that discretion in an arbitrary and discriminatory manner. Public School 19 is the only school in District 14 on split-session classes, and it has been on split-session classes for the past 12 years. Moreover, plaintiffs know of no other school in recent history that has been on split sessions for as long a period as Public School 19.
- 52. This longstanding discrimination against Public School 19 is part of a larger pattern and practice of discrimination by the defendants. Puerto Rican Students comprise approximately 26% of the New York City School district student population. On information and belief, there are only seven other public elementary schools presently operating with split-session classes. Compared to the percentage of Puerto Rican students city-wide, these seven schools have a disproportionate number of Puerto Rican students:

District No. 15	Puerto Rican
P.S. 94	62.4%
P.S. 124	70.7%
District No. 32	
P.S. 75	69.9%
P.S. 86	28.5%
P.S. 106	69.1%
P.S. 116	78.9%
P.S. 151	62.6%

53. The loss of educational opportunity as a result of split sessions is clear. A report issued by New York State Education Department in 1961 entitled "Orjectives of Elementary Education, The 3R's and Much More" indicated that:

Length of School Day

Reductions in the length of the school day represent a serious threat to the future of children and their society. This threat is particularly significant in consideration of the increased educational demands which modern life imposes on those who live in a democratic society.

It is incumbent on school officials to maintain a daily school schedule which permits adequate time for each child to have the best educational experience. Daily schedules for the elementary schools of New York State should be maintained for at least the minimum hours listed below:

Kindergarten

All day Half-day 5 Hours 2 1/2 Hours

Grades 1 thru 6

5 Hours

and Board of Education as a baric minimum, the effective loss of one day per week results in a limited opportunity to acquire skill in language arts and mathematics, and, on information and belief, little or no opportunity to acquire skills in social studies, science and health, arts and crafts, and physical activities.

- 55. The 'imited programming is particularly egregious for according to the latest Board of Education statistics, in 1975 percent of the students at Public School 19 were categorised that a public moderate or severe English language difficulty.
- in the results of the Metropolitan Achievement Tests (MAT's) administered by the defendant Board of Education. Students at Public School 19 have scored among the poorest in Community School District No. 14 and in the New York City School District. The 1972 reading achievement tests indicated that only 14.3% of the students attending Public School 19 read at or above grade level. The 1973 reading achievement tests indicated that the median sccool for fifth grade students was one and a half years behind the national median. On information and belief, these differences between the reading levels of plaintiffs who have attended splinsession classes and students attending full time increases with each year of education.
- 57. But even the MAT scores are not sufficient measure of the inadequate education suffered by the plaintiffs. The MAT are not given to those students who have very severe language

difficulties. On information and belief this is approximately 10% of the students at Public School 19. Moreover, the MAT's only measure the level of reading and do not measure speaking ability or oral comprehension of English or any of the other 6 critical curriculum areas. (See paragraph 53).

- 58. On information and belief, defendants' maintenance of split-session classes which fail to provide plaintiffs with an equal educational opportunity inevitably results in higher truancy and drop-out rates and underrepresentation in academic high schools graduation and eventually college study.
- terminate the continued maintenance of split-session classes have been de minimus. During the 1964-1965 school year, defendant Board of Education constructed eleven pre-fabricated classrooms so that the fourth grade, which had been operating on split session the previous year, could attend on a full time basis. The first, second and third grades continued to attend split-session classes.
- 60. In the 1972-1973 school year, defendants permanent—
 ly transferred the sixth grade to Public School 17. However, the
 transfer had no effect on defendants' continued maintenance of
 split-session classes for the first, second and third grades at
 Public School 19, for it coincided with the demolition of the above—
 mentioned pre-fabricated classrooms. Moreover, this transfer has
 the effect of further disrupting plaintiffs' educational process,
 since plaintiffs attend Public School 17 for only one year before
 being transferred again to a Junior High School.
- 61. On information and belief, although the defendants Board of Education and Community School Board of District No. 14 have sought and received appropriations from the capital budget of the City of New York for the construction of public elementary schools, defendants have sought no appropriations to alleviate the overutilization and split-session classes at Public School 19 so that plaintiffs could be provided with an equal educational oppor-

FIRST CLAIM FOR RELIEF

of split-session classes at Public School 19 violates plaintiffs right to an equal educational opportunity on the basis of race, color and national origin in violation of the Equal Protection. Clause of the Fourteenth Amendment to the United States Constitution and 42 U.S.C. §1983.

VI

SECOND CLAIM FOR RELIEF

- 63. Plaintiffs repeat and reallege paragraphs 1 throads as if such paragraphs were more fully alleged herein.
- receives over \$100 million annually in financial assistance from the United States government. Title VI of the Civil Rights Act of 1964 prohibits the denial of equal educational opportunities the plaintiffs on the grounds of their race, color or national origin by the recipients of Federal financial assistance.
- of split-session classes at Public School 19 violates plaintiffs right to an equal educational opportunity on the basis of race, color and national origin in violation of Title VI of the Civil. Rights Act of 1964, 42 U.S.C. § 2000d and the regulations and guidelines promulgated thereunder and the Fourteenth Amendment the United States Constitution.

VII

THIRD CLAIM FOR RELIEF

- 66. Plaintiffs repeat and reallege paragraphs 1 thro
 61 as if such paragraphs were more fully alleged herein.
- 67. Defendants' maintenance of split-session classes fails to provide plaintiffs with an adequate amount of education instruction to obtain basic minimal skills depriving plaintiffs

of the full enjoyment of the rights secured by the First and Fourteenth Amendments to the United States Constitution.

VIII

IRREPARABLE INJURY

68. Plaintiffs and members of their class have no adequate remedy at law. Defendants' continued and systematic maintenance of split-session classes at Public School 19 has caused, and unless enjoined by this Court, will continue to cause plaintiffs and their class irreparable hardship and injury.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs respectfully pray, on behalf of themselves and all others similarly situated, that this Court:

- (a) Enter an order that this action is to be maintained as a class action.
- (b) Enter a declaratory judgment pursuant to 28 U.S.C. \$2201 declaring that defendants' maintenance of split-ression classes violates plaintiffs' rights under the First and Fourteenth Amendments to the United States Constitution, Title VI of the Civil Rights Act of 1964, 42 U.S.C. \$2000d, and regulations and guidelines promulgated thereunder.
- (c) Enter a declaratory judgment declaring that an equal educational opportunity for plaintiffs requires the provision of adequate educational facilities and compensatory education.
- (d) Enter preliminary and permanent injunctions enjoining defendants from continuing to deprive plaintiffs and their classes of an equal educational opportunity by the continued maintenance of split-session classes.
- (e) Enter preliminary and permanent injunctions requiring the defendants:
- (1) to establish and implement an affirmative plan satisfactory to this Court which
- (A) provides plaintiffs with an equal educational opportunity by constructing an additional educational facil

(B) requires defendants to as serate the construction of any educational facility presently intemplated by defendants which is located within the community and by Public School 19.

(C) provide special programs compensate to the maximum extent feasible, for defendants parailure to provide plaintiffs and their class with an equal example ational opportunity.

(2) to submit the above plan to the art for approval with thirty (30) days of the entering of to order.

(f) retain jurisdiction of this action of the defendants fully comply with the order of this Court of this Court.

(g) award plaintiffs their costs and d sements incurred herein.

(h) award plaintiffs reasonable attorno es.

(i) grant such other and further relies to this Court may seem just and proper.

Respectfully submitted,

DATED: BROOKLYN, NEW YORK MAY 22, 1974.

RICHARD S. PANEBIANCO, IRA S. BEZOZA, of counse PATRICIA VERGATA WILLIAMSBURG NEIGHBORHO

260 Broadway Brooklyn, New York 112.

Tel: 782-6195

EGAL SERVICES

CESAR A. PERALES
KENNETH KIMERLING
PUERTO RICAN LEGAL DEF.
EDUCATION FUND, INC.
815 Second Avenue
New York, New York
Tel: 687-6644

Attorneys for Plaintifi

ANSWER

74 Civ. 783

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PARENTS: COMMITTEE OF PUBLIC SCHOOL 19, et al.,

Plaintiffs,

Plaintills

-against-

THE COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT NO. 14 OF THE CITY OF NEW YORK, et al.,

Defendants.

•

Defendants, by their attorney, ADRIAN P. BURKE, Corporation Counsel of the City of New York, for its answer to the complaint respectfully allege as follows:

AS TO THE ALLEGED JURYSDICTION

- 1. Dony each and every allegation contained in paragraph "1" thereof except admit that plaintiffs purport to bring this action as a class action on behalf of their minor children, students at Public School 19, and that split session classes have been maintained at Public School 19.
- 2. Deny each and every allegation contained in paragraph "2" thereof except admit that plaintiffs purport to bring this action under the statutes referred to in said paragraph.

AS TO THE ALLEGED PARTIES

- 3. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "3" thereof.
 - 4. Deny knowledge or information sufficient to

form a belief as to the truth of the allegations contained in paragraph "5" thereof which relate to plaintiff Jose Garcia.

- 5. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "9" thereof which relate to plaintiff Jenny Alvarado.
- 6. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "13" thereof which relate to plaintiff Maribel Esteres.
- 7. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "21" thereof which relate to plaintiff Maria Rondon.
- 8. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "24" thereof which relate to plaintiff Jimmy Rivera.
- 9. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "33" thereof which relate to plaintiff Janet Vasquez.
- 10. Deny the allegations contained in paragraph "34" thereof and respectfully refer the Court to Section 2590-e of the New York State Education Law wherein is set forth the powers and duties of a community school board.
 - 11. Deny the allegations contained in paragraph

"35" thereof and respectfully refer the Court to Section 2590-f of the New York State Education Law wherein is set forth the powers and duties of a Community Superintendent.

- 12. Deny the allegations contained in paragraph "36" thereof, and respectfully refer the Court to Section 2590-g of the New York State Education Law wherein is set forth the powers and duties of the Board of Education of the City of New York.
- 13. Deny the allegations contained in paragraph "37" thereof, and respectfully refer the Court to Section 2590-h of the New York State Education Law wherein is set forth the powers and duties of defendant, Irving Anker.

AS TO THE ALLEGED CLASS ACTION

- 14. Deny each and every allegation contained in paragraph "38" thereof, except admit that plaintiffs purport to bring this action pursuant to Rules 23(a) and (b)(2) of the Federal Rules of Civil Procedure on their own behalf and as a class action.
- 15. Deny each and every allegation contained in paragraph "39" thereof, except admit that for the 1973-1974 school year over fourteen hundred children were enrolled at P.S. 19.
- paragraph "40" thereof, except admit that each parent named in the complaint has a child attending Public School 19 who is, or has been, in a split session class.
- 17. Deny each and every allegation contained in paragraph "41" thereof.

- paragraph "44" thereof and ages that the present school population of Public School 19 is approximately 85% Puerto Rican.
- 19. Deny each and every allegation contained in paragraph "45" thereof.
- 20. Deny each and every allegation contained in paragraph "46" thereof except admit that since the 1961-1962 school year, some of the classes in the first, second and third grades of P.S. 19 have been maintained on split sessions.
- 21. Deny each and every allegation contained in paragraph "49" thereof except admit that plaintiffs who are in split session classes receive four hours of daily instruction, and pupils who are not in split session classes receive five hours of daily instruction.
- 22. Deny each and every allegation contained in paragraph "50" thereof and respectfully refer the Court to Section 77(2) of the By-Laws of the Board of Education of the City of New York for the full text of the said By-Law.
- 23. Deny the allegations contained in the first sentence of paragraph "51" thereof. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in the third sentence of paragraph "51" thereof.
- 24. Deny each and every allegation contained in paragraph "52" thereof, except admit that Fuerto Rican

students comprise approximately 26% of the New York City School district population, and that P.S. 94 and P.S. 124 in District No. 15, and P.S. 86 in District No. 32, maintain split session classes.

- 25. Deny the allegations contained in paragraph "53" thereof and respectfully refer the Court to the report referred to therein for the full text of the said report.
- 26. Deny each and every allegation contained in paragraph "54" thereof.
- 27. Deny each and every allegation contained in paragraph "55" thereof.
- 28. Deny each and every allegation contained in the first, second and fifth sentences of paragraph "56" thereof, and aver that in the last three years the M.A.T. reading scores for grades 2 through 5 at P.S. 19 have improved.
- 29. Deny each and every allegation contained in the first sentence of paragraph "57" thereof, and deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in the third sentence of paragraph "57" thereof.
- 30. Deny each and every allegation contained in paragraph "58" thereof, and aver that according to the 1974 report of the Bureau of Attendance, of the twenty-one (21) schools in District 14, P.S. 19 ranked second highest in attendance.
- contained

 31. Deny each and every allegation/in the first
 sentence of paragraph "59" thereof, and deny the allegations

contained in the third sentence of paragraph "59" thereof insofar as they tend to imply that the entire third grade of P.S. 19 attended split session classes.

- paragraph "60" thereof, except admit that in 1973, the prefabricated classrooms were demolished, and that the 6th grade students referred to in paragraph "60" attend P.S. 17 for one year before entering Junior High School.
- paragraph "61" thereof, except admit that the defendants have sought and received appropriations from the capital budget of the City of New York for the construction of public elementary schools, and aver that the bulk of the funds received by District 14 for school construction in recent years has been used to relieve the overcrowded conditions in the predominately Puerto Rican area of District 14.

AS TO THE CLAIMS FOR RELIEF

- 34. Deny each and every allegation contained in paragraph "62" thereof.
- peats and reiterates with the same force and effect as if fully set forth herein, its answer to paragraphs "1" through "61" herein.
- 36. Deny each and every allegation contained in paragraph "65" thereof.
- 37. With respect to paragraph "66" thereof, repeats and reiterates with the same force and effect as if fully set forth Lerein, its answer to paragraphs "1" through

38. Deny each and every allegation contained in paragraphs "67" and "68" thereof.

FOR A FIRST AFFIRMATIVE DEFENSE

39. The complaint fails to state a claim upon which relief can be granted.

FOR A SECOND AFFIRMATIVE DEFENSE

40. Plaintiffs may not maintain this action as a class action under the standards set forth by Rule 23 of the F.R.C.P.

FOR A THIRD AFFIRMATIVE DEFENSE

- Al. At a public meeting of Community School

 Board 14, on June 26, 1974, a resolution was passed which

 completely eliminates the split sessions at P.S. 19 complained

 of in this action.
- fective with the 1974 fall term, eight fifth grade classes and five fourth grade classes shall be transferred to existing vacant space at the neighboring P.S. 122 Annex, and the resolution further provides that the transfer is to be on an interim basis pending the completion of the Early Childhood Center directly adjoining P.S. 19 which is now under construction and scheduled for completion by the fall of 1975. This resolution is set forth in the minutes of the public meeting of June 26, 1974, annexed hereto as Exhibit "A."
- 43. Accordingly, the causes of action raised in the complaint have become most and there is no justiciable

controversy presented harein.

FOR A FOULTH APPIRMATIVE DEFENSE

P.S. 19 in good (aith, for the purpose of relieving the serious overcrowding at P.S. 19, and without any considerations of race or ethnic background.

FOR A FIFTH AFFIRMATIVE DEPENSE

45. Defendants have repeatedly discussed with plaintiffs or their affiliates the possibility of eliminating the split sessions by transferring classes from P.S. 19 to adjoining schools.

FOR A SIMPH AFFIRMATIVE DEFENSE

46. The plaintiffs have failed to exhaust their administrative remedies under Section 2590-1 of the New York State Education Law and the rules and regulations promulgated thereunder.

WHEREFORE, defendants respectfully request judgment dismissing the complaint, together with the costs and disbursements of this action, and such other and further relief as the court deems just and proper.

Dated: New York, New York
July 30, 1974

ADRIAN P. BURKE Corporation Counsel of the City of New York

y holand " to

DERORAH ROTHMAN Attorney for Defendants Office and P.O. Adaress: Nunicipal Building New York, N.Y. 16007 Tel. No. (212) 566-2186 BHOSHER ROBERT F. LALLY, PRESE NO THEMMAS STROHMENGER, 1ST VICE PRESIDENT AMGEL I. REVES, 2ND VICE PRESIDENT PABEL LEOPOLD LEFKOWITZ, SECRETARY JYSEPH BONOMO, TILASURER PLIER DELLA IACONO LEROY FREDERICKS ROMAN A. MIZGALSKI LUISA RIVER WILLIAM A. ROCERS COMMUNITY SUPERINTENDENT

BOARD OF EDUCATION

CITY OF NEW YORK

COMMUNITY SCHOOL BE

DISTRICT 14

310 SOUTH 13T STREET

BROCKLYN, N. Y. 11211

July 2, 1974

JA 36

387-9094

MINUTES OF JUNE PUBLIC MEETING

DATE: Wednesday, June 26, 1974

PLACE: J.H.S. 126 424 Leonard Street, Brooklyn, N.Y.

The meeting was called to order at 7:45 p.m. All members and the Community Superintendent were present.

A motion was made, seconded and approved to move item #3 to item #2 on the agenda. A motion was made, seconded and approved to move item 4 to item 3 on the agenda. Item 2 on the agenda then became item 4.

1. The minutes of the May Public Meeting were read and approved with corrections. Correction under New Business: A list of holding per session jobs was requested from the Superintendent.

2. A resolution to vacate the District Offices and use the building as a temporary annex to P.S. 19 was tabled without

discussion.

3. Resolved: That the Community Superintendent be directed to investigate the feasibility of converting the District Office for use as an annex to P.S. 19 beginning in September, 1974 and report to the Board at its next Executive Meeting. The motion was seconded and approved by a majority vote. At this point, the Chairman suspended the mosting for approximately 15 minutes due to a disturbance that made it impossible to conduct business. After to commotion had subsided somewhat, the meeting resumed.

4. The resolution, originally item 2 on the agenda, was divided

into 6 parts, each seconded and voted on separately.

1. effective with the 1974 fall term, eight fifth grade and five fourth grade classes (to be identified by the Community Superintendent) shall be transferred to existing vacant space at the neighboring P.S. 122 Annex, such transfer to be on an interim basis pending (a) the completion of the Early Childhood Center directly adjoining P.S. 19 which is now under construction and scheduled for completion by the fall of 1975 and (b) the projected decrease in enrollment at P.S. 19;

2. CSB 14 hereby respectfully requests the New York City Board of Education to expedite the leasing of Saint Francis Prep and re-affirms its earlier resolution of April 24, 1974 to such effect in order that such space can be utilized to reduce overcrowding at P.S. 19, P.S. 17 and elsewhere and to enable CSB 14 to consolidate the fifth and sixth grades of P.S. 19 as soon as possible;

CSB 14 hereby authorizes and directs its Community Superintender to develop and institute such compensatory and remedial program. as he shall find necessary in his judgment to climinate an educational deprivation (if any) experienced by students at P.S. 19 and to assign a high priority to such programs in the allocation of Title I and similar funds; CSB 14 hereby authorizes and directs its President and Community

Superintendent to meet with officials of Kraus Realty, inc., and of the New York City Board of Education to discuss the feasibility of incorporating an elementary school into the housing project

currently planned by such firm;

CSB 14 hereby invites all concerned parents associations to submit an additional proposal with respect to the overcrowding

problem; and The Board hereby agrees to use its best efforts to provide transportation without cost to all students who are relocated, subject

to budgetary limitations.

The vote on each section (1), (3), (4), (5), (6) was: in favor, Lally, Bonomo, Della Iacono, Lefkowitz, Mizgalski, Strohmenger. Abstentions: Reyes, Fredericks, Rivera. The roll call vote on section (2) was: in favor, Mizgalski, Bonomo, Strohmenger, Lefkowit., Della Iacono. Abstentions: Ially, Rivera, Fredericks, Reyes. All six sections of the resolution were approved.

5. Resolved: That the Community School Board 14 protests the continuing delays in the construction of Northeast Brooklyn High School (replacing Eastern District H.S.) and demands immediate steps to be taken to have the balance of the work started forthwith: and, That a letter to this effect be sent to the Board of Education and the Chancellor by the Community Board President. This motion was seconded and approved.

6. Resolved: That Robert Rehm be appointed Supervisor of Continuing

Education. The motion was seconded and approved.

7. Resolved: That Jeffrey Feingold be appointed Acting Assistant Principal for Title I. The motion was seconded and approved.

8. Resolved: That William O'Shaughnessy be appointed Acting Assistant Principal for State Urban Education. The motion was seconded and approved.

9. Resolved: That Mr. Frank Longo be appointed Acting Principal of

The motion was seconded and approved. J.H.S. 50.

That John Lynch be appointed Acting Principal of 10.Resolved: P.S. 122. The motion was seconded and approved.

11. Resolved: That Intelicor. Inc. be approved as evaluators for Summer Programs for 1974. The motion was seconded and approved.

12. Resolved: That the Board hereby suspends Article II, Section I of the By-laws concerning the Annual Meeting. The motion was seconded and approved.

13. Resolved: That the following officers be elected for 1974/75: Pres. Lally; 1st Vice Pres Strohmenger; 2nd Vice Pres. Della 20000; Sect. Lefkowitz; Treas. Bonomo. The motion was seconded and approved. A motion to adjourn was passed unanimously. The meeting adjourned at 9:45 p.m.

MPURTANT

Notice of Motion for Preliminary Injunction

JA 38

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL #19, et al,

Plaintiffs,

74 CIV. 783 (JBW)

-against-

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL BOARD #14 OF THE CITY OF NEW YORK, et al,

Defendants.

: NOTICE OF MOTION FOR : PRELIMINARY ENJUNCTION

Upon the complaint herein, and upon the attached affidavits of Kenneth Kimerling, counsel for plaintiffs; Maria Garcia, plaintiff herein; Dr. Ruth Adams, Professor of Education at City College; Carmen Dinos, Assistant Professor of Education at Brooklyn College; Dr. Michael Stewart McColgan, bilingual education administrator; Dr. Doxey A. Wilkerson, Professor Emeritus of Yeshiva University and Vice President of Mediax Associates, Inc.; and Julian Neski, registered and licensed architect, plaintiffs will move this Court in Room 10

1. Preliminarily enjoining defendants, their agents, employees and those in active concert with them from denying plaintiffs and their class an equal educational opportunity by the continued maintenance of split-session classes;

United States Courthouse, Cadman Plaza, Brooklyn, New York

65 of the Federal Rules of Civil Procedure:

on August 15, 1974 at 10:00 A.M. for an order pursuant to Rule

- 2. Preliminarily enjoining defendants, their agents, employees and those in active concert with them from transferring students in the fourth and fifth grades of P.S. 19 to P.S. 122.
- their agents, employees and those in active concert with them to prepare a plan that effectively ends split-sessions at P.S.

 19 and provides plaintiffs and their class with the necessary remedial and compensatory programs to overcome their past educational deprivations and does not disrupt plaintiffs' education with further transfers. Such plan shall be prepared in cooperation and consultation with plaintiffs and be submitted to the Court within 7 days of the entering of this order;
- 4. Granting such other and further relief as this Court deems just and proper.

Dated: Brooklyn, New York August 5, 1974

RICHARD S. PANEBIANCO

IRA S. BEZOZA / PATRICIA VERGATA

WILLIAMSBURG NEIGHBOF LEGAL

SERVICES

260 Broadway

Brooklyn, New York 11211

212-782-6195

KENNETH KIMERLING
HERBERT TEITELBAUM
PUERTO RICAN LEGAL DEFENSE
& EDUCATION FUND, INC.
815 Second Avenue
New York, New York 10017
212-687-6644

Attorneys for Plaintiffs

PARENTS'COMMITTEE OF PUBLIC SCHOOL #19, et al,

74 CIV. 783 (JBW)

Plaintiffs,

AFFIDAVIT OF KENNETH KIMERLING

-against-

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT #14 OF THE CITY OF NEW YORK, et al,

Defendants.

STATE OF NEW YORK)

) SS.:

COUNTY OF NEW YORK)

KENNETH KIMERLING, being duly sworn deposes and says that:

- 1. I am an attorney for plaintiffs herein, and I make this affidavit in support of the motion for preliminary injunction.
- 2. The complaint in this matter was filed on May 22, 1974. At that time children in the first, second and third grades at P.S. 19 attended split-session classes. P.S. 19 has had split-session classes for 13 years longer than any other school in the City. The children in these classes have lost one hour a day of educational instruction and each week have effectively lost a days education.
- 3. While P.S. 19 is in a district in which the majority of the children are Puerto Rican or Hispanic, it, in fact, has the highest concentration of Puerto Rican and Hispanic students in the city. Moreover, a survey done by counsel for plaintiffs, indicates that seven of the nine schools on split-session in

JA 41

1973-74 were predominantly Puerto Rican and one of the others was predominantly Black and Puerto Rican.

- 4. The efforts of the defendants to relieve this situation have ranged from harmful to de-minimus. Portable classrooms were built in 1964 to allow the fourth grade to attend full-time. The fourth grade had been on split-session for the previous year. In 1972, these inadequate structures were closed, and in the middle of the school year the sixth grade was moved to P.S. 17. The sixth grade has remained at that school and attends it for one year before transferring to another school for seventh grade. The harmful nature of this type of transfer, for a one year period, has been set forth in the affidavits of Dr. Ruth Adams, Professor Carmen Dinos. Dr. Michael Stewart McColgan and Dr. Doxey A. Wilkerson.
- 4.A. Adjacent to the school, an Early Childhood Center for the Education of pre-kindergarten and kindergarten children is being built. It is scheduled to be completed for the 1975-76 school year. This facility will help relieve the overcrowding by absorbing the kindergarten which would free four or five class-rooms in P.S. 19. However, the school presently needs 13 additional classrooms to end split-sessions and a total of 21 additional classrooms if the sixth grade is to be rejoined with the school.
- 5. While doing nothing concrete for P.S. 19, the defendants in 1970, leased a building a block and a half from P.S. 19 to be used as District offices. The building had been previously used as a school, a Yeshiva, and could have easily been converted for use by the children at P.S. 19. Nevertheless, the building

was remodeled for office space at the cost of about \$300,000 amortized over ten years with the rent at \$72,000 per year. In 1970, when these offices were leased, there were two schools almost totally empty, P.S. 122 and JH.S. 126 and 3 other schools with a 60 to 70 percent utilization rates.

- 6. In response to our lawsuit, the six of the members of the Community School Board voted to transfer the students in the fourth and fifth grades to P.S. 122. This school has been emptied of most of its students since 1970 following a community boycott regarding the use of this obsolete facility. (Attached as Exhibit I, is a New York Times' articles of February 15, 1967 and February 16, 1967 reporting on the boycott.) The defendants have themselves recognized the "obsolescence of the existing structure and the need to replace it with a building equipped to accomodate a modern program of primary school education" (letter of December 20, 1966 from Dr. Morris Nelson Sachs, Programming Director of the Board of Education to Mrs. Luisa C. Rivera, President of the Parents Association of Public School 122 attached as Exhibit II, Mrs. Rivera's letter to Dr. Nelson is attached as Exhibit III). In the School Building Program of 1970-71 published by the Board of Education in September 1969, P.S. 122 was referred to as "obsolete", and its replacement P.S. 380 was given the number 10 priority out of 330 projects proposed.
 - 7. Julian Neski, a licensed and registered architect and a Fellow of the American Institute of Architects, visited P.S. 122 on July 29, 1974. He found many of the conditions reported by Mrs. Rivera in 1966 (in Exhibit III) were still existing. Moreover, he found numerous dangerous conditions in violation of the New York City Building Code that would threaten

the lives of the children in the school in the event of a fire.

He estimated that the repairs and modernization of the building for use as an elementary school would cost at least one million dollars.

- 8. The planned transfer to P.S. 122 would not only threaten the physical safety of the plaintiff children, but would completely disrupt their education. The affidavits of Dr. Adams, Professor Dinos, Dr. McColgan and Dr. Wilkerson amply set forth the psychological and educational harm to plaintiffs which would result from the transfer to P.S. 122. All these educators believe that a transfer of the fourth and fifth grades to P.S. 122 to be followed by a transfer to P.S. 17 for the sixth grade, would only compound the lost educational time caused by split-session and irreparably injure the children.
- 9. As the affidavit of plaintiff Maria Garcia attests, the transfer will also have a stigmatizing effect as a result of the continuous onerous treatment that the children have received.
- split-session classes; however, the transfer to P.S. 122 would not end the injury to these children. Unless there is a plan which provides for continuity of education in a familiar and convenient setting combined with affirmative steps for remedial and compensatory education, the 1974-75 school year will be another lost year added to the many lost years that plaintiffs have already suffered. Wherefore, preliminary relief is necessary

to protect plaintiffs from irreparable injury.

KENNETH KIMERLING

Sworn to before me this

5th day of August 1974

PATRICIA VERGATA

NOTARY PUBLIC, STATE OF NEW YORK

NO. 31-4520545

Cart. Filed in New York Dounty

Comprission Expires March 30, 1976

955 OF 959 ABSENT IN SCHOOL BOYCOTT

Brooklyn Protest Wins City Promise to End Disterair

By MARTIN ARNOLD

Parcais in the William burg section of Brooklyn kept 965 of 959 children out of Public School 123 yesterlay in a boycut protesting poor conditions at the school.

The boycott and picketing by the parents were so dramatically successful that Dr. Nathan Brown, executive deputy super-intendent of schools, scurried over to the 67-year-old school building at 68 Harrison Avenue from the Board of Education beliefing, 110 Livingston Street. He offered the parents a program that temporarily at least ended a two-year dispute between the neighborhood and the Board of Education.

"We got it in writing, and Dr. Brown seems like a new type at they board—a sincere man," said Mrs. Cecila Vice chairman of the local schoo' board. "We'll have to wait and ace. We hope the battling is over now."

for construction of a new school and in the meantime to transfer some of the students out of P.S. 122 and renovate the building for use by the remaining pupils.

The pickets and boycott were led by Mrs. Lusia Rivera, president of the school's Parent-Teacher Association. Mrs. Rivera and Mrs. Vice agreed to accept Dr. Brown's compromise plan and called off the boycott, which was scheduled to continue today.

P.S. 122 is a four-story brownstone structure. A small basement room is used as an auditorium and gymnasium. Four large pillars obstruct this room, and leaking water pipes hang from its walls.

Pre-kindergarten and kindergarten children have to climb two flights of narrow stairs to go to a washroom, and in one hindergarten class part of the cailing has a glass "window."

The window leaks during rainstorms, and the children "finat boats on the floor," and Miss Susan Portnoy, a teacher.

The lunchroom, which is supposed to feed nearly 500 children, is a small converted classroom in which only 80 children at a time can be handled. Garbage pails overflow in it during hunch periods, but there is no place else in the building to put the refuse.

Children in the second grade sit in front of 30-inch-high desics, which were designed for junior high school students. The Board of Education originally planned to replace the school with a new structure, but this project was given a lew priority.

Three New Buildings Due

Instead the board built an intermediate school, I.S. 318, several blocks away from P.S. 122. The new school is scheduled to open either next September or in February, 1968. Another new school, I.S. 71, is planned for construction in 1968 adjacent to P.S. 122.

The parents of P.S. 122 want one of the new buildings used as an elementary school rather than an intermediate school. Under the agreement worked out yesterday by Dr. Brown, the board will give a third new school—an elementary school for use by the neighborhood—"high priority" and include it in the 1967-68 capital budget.

Mcanwhile the board will transfer P.S. 122's third-graders and fourth-graders to the nearby I.S. 318 and will renovate the old structure for children in pre-kindergarten classes through the second grade.

In another development yesterday, parents concerned with the physical condition of Seward Park High School, at Essex and Grand Streets on Manhattan's Lower East Side, met with Borough President Percy. Sutton. They asked for a new annex because of the school's present overcrowded conditions.

Mr. Sutton promised to fight for the annex in the 1967-68 capital budget. The school now operates on three shifts, with nearly 4.000 pupils in a building constructed to accommodate 2,400. On Feb 1 the board eased the situation a bit by opening an abandoned school building on Monroe Street as an annexe.

2D BOYCOTT CALLED BY P.S. 122 PARENTS

A school boycott in the Williamsburg section of Brooklyn was called again by parents last night after they rejected a Board of Education compromise plan because "we do not trust the board."

The parents, who had kept 955 of 959 children out of Public School 123 on Tuesday, are protesting the poor condition of the building, which is at \$8 Harrison Avanue.

Yesterday, promises by the board to push construction of a new school and in the meantime, repair the present school building appeared to have been accepted by the parents. Two-hundred children returned to classes.

But at a meeting last night, 300 members of the parent-Teacher Association unanimously rejected the proposal. Dr. Nathan Brown, executive deputy superintendent of schools, had offered the plan in writing to Mrs. Lusia Rivera, president of the P.T.A.

The parents and they would not settle for repairs and announced that; their children would be kept out of school today. Mrs. Rivera said a delegation would go to City Hall this afternoon to discuss the school's condition.

Links of Generals' Booked

Dacamber 20, 1966

GUBJECT: Public Ochool 122,

Brocklyn

Parents' Association of Public School 122
63 Harrison Avenue
Brooklyn, New York 11211

Dear Mrs. Rivers:

December 16, regarding the status of Public School 122, Brooklyn.

We are in complete agreement with the Parents' Association of Public School 122 on the obsolascence of the existing structure and the need to replace it with a building eq . ped to accormodate a modern program of primary school edulation. In accord with this decision, we recommended, many years ago, that Public School 122, Brooklyn, be replaced by a new school, which, at that time, we referred to as Public School 71, Brocklyn. However, less than two years ago, the Board of Education adopted a proposal, initiated by the State Commissioner of Education assisted by a special Commission, to shift the organization of the schools from the present 6-3-3 plan to a newer educational ladder which includes 4-year comprehensive high schools, 4-year intermediate schools, and primary schools for classes extending from Pre-Kindergarten through Grade 4. The need to shift the two upper grades currently housed in elementary schools into new middle schools created a pressing problem because of lack of space for intermediate grades. This made it extremely urgent to assign the highest priorities to (1) new high schools in order to make possible the removal of Grade 9 from excisting junior high schools, and (2) intermediata schools in order to make possible the removal of Gradas 5 and 6 from existing elementary schools into the new middla schools.

As one consequence of the shift in the organization of the schools, it became necessary to alter the master plan for school construction that had been developed during the last few years. Steps were taken to advance the construction of needed high schools and intermediate schools. Ever so many

-2-

elementary school projects, based on the older 6-3-3 plan of organization, were found to be unnecessary in some instances or not as urgently required in other instances.

In an effort to provide middle school facilities in the Williamsburg community at the earliest possible date, the plan to replace Public School 122, Brooklyn, was modified. Public School 71, was converted into an intermediate school and a new replacement project was introduced in the building program which the Board of Education adopted on September 28, 1966; namely, new Public School 380.

In other words, the building program of the Board of Education includes two projects in place of the former one: I.S. 71, designed to provide facilities for children in Grades 5-8, and P-360, designed to replace P-122. It should also be borne in mind that Grades 5 and 6, formerly housed in P-122, will ultimately be accommodated in I.S. 71. The revision of the master plan for your community did not deprive your neighborhood of a school. Actually, it resulted in provisions for two schools, an intermediate school and a primary school, in place of the elementary school which was originally contemplated.

Very truly yours,

Merria Walson Sachs Programing Section Director

MIS:sc

JA 48

December 10, 1960

Dr. Helson Sachs School Planning and Research Board of Education 110 Livingston Street Brooklyn N.Y.

Dear Dr. Sachs:

The Parents' Association of Public School 122, located on Harrison Avenue and Rutledge Street in Brooklyn, is deeply disturbed by the recent announcement that an intermediate school, I.S. 71, is being proposed in the vicinity of the present P.S. 122. The proposed I.S. 71 was originally vicinity of the present P.S. 122. The proposed I.S. 71 was originally designated as an elementary school, Public School 71, and we were under the impression that it would be the replacement for P.S. 122.

We would like to enlist your support in our fight. Since 1960 a new school has been requested each year and the item 7.5. 71 has been recommended by the Board of Education in every school budget since 1961. We are shocked now to think that thenew school proposed will be an intermediate school. The proposal is all the more incredible since 1.5. 318 is presently being constructed on Loriner Street and Throop Avenue, just three blocks from the site of the proposed 1.5. 71.

- P.S. 122 is an overaged, obsolete, unsafe building in the Williamsburg area. We need a new school for these reasons:
 - 1. No auditorium.
 - 2. No gymnasium.
- 3. A wholly inadequate lunchroom with 9 tables, and a capacity of 80, serving 500 children daily. Children in this area would benefit from food cooked on the premises.
- 4. The building is dangerous because there are insufficient staircases serving the third and fourth floors. Two major exit staircases and at the second floor level and do not service children on the third and fourth floors.

EXHIBIT III

- 5. All condition leaving the building on the drills or at dismissals must leave from five exits fronting on the same dangerous thoroughfare, Harrison Avenue. During fire drills children must cross this street in order to be removed from the school area quickly.
- 6. A small, inadequate yard and no playground facilities in the area.
 - 7. No kindergarten lavatories or sinks.
- 8. Totally inadequate office space six persons using the same office and virtually no main office.
- 9. No audio-visual or science rooms and no facilities for demonstrating such materials to large groups.
 - 10. Inadequate bathroom facilities for children and teachers.
 - 11. No Public Address system.
- 12. Violations due to many rotten window frames and sashes leading to frequent leaks.
 - 13. Outside walls are porous in a number of areas.
- 14. Lany rooms have no space for pure! wardrobes, children hanging their clothing on exposed hooks.

This school plant imposes further disadvantage to the youngsters of a disadvantaged community. In our affluent society no child should be required to live and work under these conditions.

We want the new school I.S. 71 redesignated as Public School 71 (Elementary) as it originally was. Our parents have just drawn up a petition and are anxious to meet with you about this intolerable situation.

Thank you for your help.

Sincerely yours,

Imisa C. diverq President, Parents' Assn.

JA 50

UNITED STATES DISTRICT COURT

BASTERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL 19, et al., : 74 Civ. 783 (JBW)

: AFFIDAVIT

: . OF

: MARIA GARCIA

Plaintiffs,

-against-

-----х

COMMUNITY SCHOOL BOARD OF :
COMMUNITY SCHOOL DISTRICT NO. 14 :
OF THE CITY OF NEW YORK, et al., :

Defendants.

STATE OF NEW YORK)

SS.:

COUNTY OF KINGS)

MARIA GARCIA, being duly sworn, deposes and says, that:

- I reside at 376 Hooper Street, Brooklyn, New York
 11211.
- 2. My children, Sylvia, Jose, Luis and Matilde, have all gone to P.3. 19 since kindergarten. In September Sylvia will be in first grade, Jose in second grade, Luis in third grade and Matilde in fourth grade.
- 3. I am the President-elect of the Parents Association of P.S. 19, having been elected to that position in May, 1974, and I am a plaintiff in this case.
- 4. Ever since my children started going to P.S. 19, I have actively participated in parent efforts to improve the school. I have been concerned about overcrowding at the school because my children had to lose time in split-session classes. Through the years the parents have urged the Principal and the Superintendent to build more space at P.S. 19 to end the overcrowding. After

B

nothing was done and after having to put up with the overcrowded conditions, we felt the best way to get something done was to go to court.

- 5. In May, after we went to court, Mr. Levine, Principal of P.S. 19 gave me a copy of a letter from Superintendent Rogers inviting me and other Parent Association parents to a meeting in the District Office on June 4, 1974 to talk about the overcrowding. (A copy of that letter is attached as Exhibit 1.)
- 6. Mr. Rogers did not come to the meeting. Mr. Carter, who used to be principal of P.S. 122, said that he was speaking for Mr. Rogers. He said that even though the Board had voted in May for a new building to be built as an annex to P.S. 19 to relieve the overcrowding, it would take a long time to be built and there had to be something done in the meantime. He said he was making two suggestions for the parents to talk over. One was that the fifth grade and five classes of the fourth grade would be transferred to St. Francis Prep, which the Board hoped to lease, and the other was that they be transferred to P.S. 122. Brother Lally came in late. Mr. Levine was there, too. The parents then asked Mr. Carter, Brother Lally and Mr. Levine questions about these proposals. Mr. Carter explained how many classrooms there were at P.S. 122 and said that they were on the third and fourth floors which had been vacant for a couple of years. He said that if the children were transferred to P.S. 122, it would be "as is", that there was no money to really improve the building. He said that the Central Board wouldn't spend any money to really improve it since they were building a new school to replace it. Then somebody asked how busses could be guaranteed, since busses had also been promised for the transferred sixth grade when they were sent to P.S. 17 which was farther than P.S. 122 and the Central Board had not supplied them. Brother Lally said that he himself

that he could guarantee them, and that the plan should be looked on as absolutely including busses. Then someone asked how long the transfers would be for, since when the sixth grade was transferred the parents were promised that it was going to be "temporary" and now they were sending away two other grades. Nobody really answered that. Brother Lally said that these transfers would be for fifth and fourth grade parents who wanted them. When somebody asked how many parents would have to want to do it to make it worthwhile, he said "Oh, it would have to be a significant number of parents".

- 7. On behalf of the Parents Association, I said we could make no decision without talking to the parents at large. Mr.

 Carter told Mr. Levine to arrange for parents' meetings at P.S. 19 for the afternoon and evening of June 11th to vote on the proposals.

 There would be two meetings so that as many parents as possible could come. We agreed that on June 12th the Parents Association would come back with the parents' decision.
- 8. I attended both parent meetings on June 11th, at which some 119 other parents altogether were present. After a lot of discussion at both meetings, parents went to the front of the auditorium and registered their decision. All but three parents out of the 119 voted against the proposals.
- why they felt the plans were bad. They thought that the transfers wouldn't really help their children, who not ded more help than usual after all the time they lost. Instead, the transfer seemed to be more second-hand treatment of their children. They remembered that when the sixth grade was sent to P.S. 17 that was supposed to be temporary. As it is, P.S. 17 is already overcrowded to the point where it has to use the pre-fab classrooms in the yard which the local board has admitted are unsuitable

JA 53

and a health hazard. Now this new plan would transfer out even more children and would mean that parents who have children in different grades would have to worry about children in three different schools in three different neighborhoods. To get to both P.S. 122 and P.S. 17, the children have to cross streets with a lot of traffic - Broadway for P.S. 122 and both Grand Street and Metropolitan Avenue for P.S. 17. It would make it really hard to check on now your children were doing and get involved with Parents Associations and staff if you had your children in three different schools.

- P.S. 122. Everybody in Williamsburg knows what a bad school it is, that's why parents never wanted the children to go there when it was suggested before. It's old and doesn't have good facilities. It's so bad they took out all the P.S. 122 children and sent them to another school, I.S. 71, because the parents at P.S. 122 complained. They're going to tear it down and build a playground for I.S. 71 there. The parents couldn't understand why our particular children should continue to get this kind of treatment. The board seems to be stigmatizing our children. No other school in District 14 has been treated this way.
- to Mr. Rogers. He said that the parents should come up with a solution. One of the parents said that some children were going to P.S. 19 who didn't live in the P.S. 19 zone and maybe they could be transferred out, but Mr. Levine said that there weren't that many and it would be like making the children go to P.S. 122.
- there was another way to do something about the problem at P.S. 19.

 There is a building that is in very good condition only a block from P.S. 19. It used to be a school, and the District Office is using it now. It has a lot ci rooms and could easily be used like

an annex to P.S. 19. Since it is so close, the children could be fit into the programs at P.S. 19 very easily. The parents wouldn't have to worry about their children being all over the place, and we could all work together with the principal and staff at P.S. 19 to help the children make up the lost time.

13. We asked one of the school board members, Mr. Leroy Fredericks, to introduce this plan as a resolution at the meeting on June 26th. Then we found out that some other members of the school board put the transfer to P.S. 122 to be voted on at this meeting, even though the parents were against it and Brother Lally had said that a significant number of parents would have to be in favor of it to try it. A lot of parents came to this meeting and signed up to speak about why they wanted their children to go to a good building only a block from P.S. 19 instead of a bad school in a different neighborhood. But when they started to talk about our plan, only I and one other parent were allowed to speak before Brother Lally recognized Mr. Dellaracono who moved to "table" our plan. Brother Lally wouldn't let any more people who were waiting speak. People got really angry and asked why he wouldn't let more people speak, but he wouldn't pay attention and be took a vote and six members voted to table our plan. Many people tried to get Brother Lally and the board to listen to u., but Brother hally just asked the Secretary to vote on all the other resolutions one after another and said the meeting was "suspended" and nobody else was allowed to speak from the audience about mything. Six of the board members voted to transfer the children to P.S. 122. Angel Reyes, Luisa Rivera and Leroy Fredericks, the two Puerto Rican and the black members of the board, refused to vote.

14. As can be imagined, the parents are deeply opposed to the proposal as it now stands to send their children to P.S. 122 because they feel it would harm the children's education even more.

MARIA GARCIA

Sworn to before me this 5th day of August, 1974.

NOTARY PUBLIC O

PATRICIA VENGATIO
HISTARY PUBLIC, STATE OF NEW YORK
No. 31-4520545
Cart. Filed in New York County
Commission Express March 30, 1978

BOARD OF EDUCATION THE CITY OF NEW YORK

OFFICE OF SCHOOL DISTRICT FOURTEEN 310 SOUTH FIRST STREET

BROOKLYN, NEW YORK 11211

.IA 56

WILLIAM A. ROGERS Community Superintendent Tel. 963-4800

May 31, 1974

Mrs. Ana Rivera, President Parents Association P.S. 19 325 So. 3d St. Brooklyn, New York 11211

Dear Mrs. Rivera:

As you know, P.S. 19 is on a split session. Children, because of the overcrowding, are forced to miss precious school time. The Community School Board and myself are greatly concerned with this matter, and we would like to meet with you and other members of the Executive Board to discuss this situation on Tuesday afternoon at 1:30 p.m. in the District Office.

William A. Kogers

Community Superintendent

District 14

em

Mr. Harold Levine Mrs. Maria Garcia, President Elect

Mr. Miguel Rivera, Treasurer Mrs. Joan Hurley, Vice President

Mrs. Connie Maldonado, Secretary

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

----X

PARENTS' COMMITTEE OF PUBLIC SCHOOL # 19, et al.,

74 Civ. 783

Plaintiffs,

(J.B.W.)

-against-

AFFIDAVIT OF RUTH ADAMS

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT # 14 OF THE CITY OF NEW YORK, et al.,

Defendants.

----X

STATE OF NEW YORK

: 55.:

COUNTY OF NEW YORK

RUTH ADAMS, being duly sworn, deposes and says, that:

- 1. I have been involved in the educational system in the New York City schools for my entire professional life. I began as an elementary school teacher in 1940, and I have taught on all levels of the educational continuum, from first through ninth grade and undergraduate and graduate courses on the college level. I have also worked on projects involving education in the high schools such as the College Discovery Program.
- 2. My educational training consists of a B.A. from Radcliffe College, an M.S. in Elementary Education with a Specialization in Reading from City College, and a Ph.D in Educational Psychology from New York University.
- 3. I have been Chairman of the Department of Elementary Education at City College since 1972. Our Department includes undergraduate and graduate programs in such areas as Early Childhood Education, Elementary Education, Bi-Lingual Education

and Day Care. As Chairman I am familiar with educational theory in all these areas. I presently teach two courses in reading and learning disabilities in elementary school education. Attached is a copy of my curriculum vitae.

- 4. I have had direct experience with programs of the Board of Education. I was supervisor of Reading Improvement Teachers for the Office of Elementary Schools in 1964-65.

 Serving as a consultant I have evaluated educational programs in almost every school district of the City of New York ranging from Title III programs in Manhattan and Queens, Title I in the Bronx and Title VII (Bi-Lingual) in Brooklyn. As part of my duties as Chairman at City College I am Coordinator of the Affiliated Schools Program and in this capacity have visited and still visit many cooperating schools.
- visited every elementary school in District 14 and P.S. 19, having and evaluator of funded programs from 1970-1972. I evaluated the DISTAR Reading and Language Program and Diagnostic Reading Center Programs in the District.
- 6. I have spoken at length with counsel for the plaintiffs and am familiar with the facts of the case. Based on the application of sound educational principles of learning, it is my opinion that the present double transfer plan of the local Board would be beyond doubt educationally harmful to these children.
- 7. I became familiar with the educational situation of the children in the District during my visits for the DISTAR

evaluation. One fact impressed me most: the population of the elementary schools had changed from one predominantly white, middle and lower class to a population that was now, in every school but one, predominantly Puerto Rican and Black from more deprived socio-economic backgrounds. In addition, many Puerto Rican children come to the school with a lack of knowledge of English. The special problems of this new and different school population require many changes in educational approach, and it was my general impression that as a whole the administrators at every level in this district had not yet sufficiently appreciated the need for these changes. In only one or two schools, and P.S. 19 was not one of them, did I see any attempt on the part of the principal or administration to include the children's cultural heritage and background in curricular planning.

- problems of the Puerto Rican child who comes to school are special. He comes trying to express himself in two languages. To allow him to learn effectively how to do this requires a continuous, sequential educational plan, including specially designed programs, that concern themselves not only with subject areas but affective aspects of learning. Generally, transferring children from school to school breaks this sequential pattern and results in overlaps and gaps in areas of learning.
- 9. Transferring Puerto Rican children is harmful for a special educational reason. Most young children's learning is dependent upon the security they feel about coming to "their" school, "their" teacher and class, and this kind of security

at least as much if not a greater need for this kind of security. Children learning a language as these children are must learn a second language through social interaction. Thus the quality of the social interaction becomes very important in this process of developing expressive and receptive language ability. Further, the development of this expressive and receptive ability is a very important factor in determining the child's ability to learn how to read, which is the basic foundation of education. A discussion of this influence of expressive ability on the reading-learning process is found in the report of the evaluation which was made of the District 14 programs, published in Evaluation of District pecentralized Projects, Final Report July 1973, Institute for Educational Development, July 1973,

- make new adjustments, the expressive language ability suffers because of the disruption in the so ial interaction process. For these Puerto Rican children in P.S. 19 to have to make the two transfers in such a short period of time will in my opinion substantially hinder their ability in the area of expressive language and concomitantly hinder their development in learning to read. The previous retardation of their ability in expressive language because of the reduced instructional time during the first, second and third grades will only be compounded by this transfer plan.
- 11. In my opinion the solution to the problem is not to slice off a portion of these children and send them to a strange setting for a short time before sending them to another

transfer to Intermediate School. Rather, if they could attend school in a nearby setting and be given an intensive, sequential program aimed at developing their language ability, the educational harm that has already been done could be lessened. This way they could still be a part of "their" school - P.S. 19 - and come back for many activities with friends and retain the continuity and sense of belonging to a specific school family that is vital to their educational development.

12. In my opinion, the double transfers planned by the Board will seriously injure the children's educational development.

RUTH ADAMS

Sworn to before me this

and day of August, 1974.

NOTARY PUBLIC

MATRICIA VERGATA
MOTARY PUBLIC, STATE OF NEW YORK
No. 31-4520545
Cert. Filed in New York County
Commission Expires March 30, 1976

CURRICULUM VITAE

NAME: RUTH R. ADAMS

COLLEGE: THE CITY COLLEGE-CUNY

HIGHER EDUCATION

A. DEGREES	DATES	DEGREE AND	DATE
INSTITUTION	ATTENDED	MAJOR	CONFERRED
Radcliffe College	1936-1940	A.B. English	1940
The City College	1956-1959	M.S.Elem. Ed.	1959
New York University	1961-1965	Pn.D. Educ. Psych.	1965

B. ADDITIONAL HIGHER EDUCATION AND/OR EDUCATION IN PROGRESS

INSTITUTION	DATES ATTENDED	COURSES, ETC.
New School of Social Research	1967	Psychology Courses; Individual Testing of IntelligenceBinet, Wisc.
American Academy of Neurology	1971	Course in Neurological Implication of Learning Disorders
National Academy of Science, NYC	1972	Course in Minimal Brain Disfunction, Implications For Learning

EXPERIENCE

A. TEACHING

INSTITUTION	DATES	RANK	DEPARTMENT
The City College	1/69 - present 1965-1969 1962-1965	Assoc. Prof. Asst. Prof. Lecturer, Part time Lecturer	Elem. Ed. Elem. Ed. Elem. Ed.
Board of Education, NYC	1964-1965	Supervisor, Reading Improve- ment Teachers, N.Y.C.	Elementary Schools Division
	1958-60; 1962-64	JHS Eng. Teacher	JHS 104 Man.
	1956-1958	Elementary School Teacher	NYC Public Schools PS 15, 19, 40
Friends Academy Locust Valley, N.Y.	1942-43	Teacher	Slementary grades
Dalton Schools, N.Y.C.	1940-42	Teacher	Elementary grades
B. OTHER			
Pres Lance Writer	1944-1949	Wrote article and short stories; Mystery Series on Brooklyn Dodger and Yankee Baseball Games-Published in Town and Village and Villager newspapers	
Private practice	1965-	Educational Evaluation	ons
Friend Seminary, NYC	1965-	Educational Consultar	nt

RUTH R. ADAMS

ACADEMIC AND PROPESSIONAL HONORS

ACADEAGE AND THE STATE OF THE S	1939
Phi Beta Kappa	1939
Phi Beta Kappa Mary and Augustus Bernard Scholarship at Radcliffe College Mary Putnam Hart Prize "for best general examination in English"	1940
n-4-14##n College	1940
Maria Cym Laude, Radcliffe College	1965
Phi Lambda Theta Society Doctoral Award Phi Lambda Theta Society Doctoral Award "Certificate of Appreciation" from CUNY for work in College Discovery Program	1965

PUBLICATIONS (Last Five Years)

1. ARTICLES AND BOOKS

Reading Action Packet: "Guide for Beginning Teachers of Reading, Grades 1-4" and "A Guide for Beginning Teachers of Reading, Grades 5-8".

N.Y.C. Board of Education Curriculum Bulletins, 1967-68.

Curriculum Bulletin in the Language Arts K-2. NYC Board of Education, 1968.

- "A Study in Concept and Attention Growth of Young Children," Elementary English, February 1970
- "Notes on An Evaluation of the Written Composition of High School Students in Five College Discovery Centers in New York City," Reading and Realism, J. Allen Figurel, editor, 1969.
- "The Identification of the Retarded Reader Within the School System,"

 Published as part of the Health, Education, and Welfare National Advisory

 Committee on Reading Report: Dyslexia in Related Reading Disorders, June 1969.
- "Early Identification of Potentially Patarded Readers Within the School System," (Chapter) in Reading Forum, NINDS Monograph, No. 11, 1971.
- "Concepts and Attention Growth of Young Children" ERIC Early Childhood
 Abstrac's, Nov. 1971

2. RESEARCH REPORTS (PUBLISHED)

An Evaluation of the Written Composition of High School Students in Five Five College Discovery Centers, Research Report 68-8, Office of Research and Evaluation of CUNY, 1968.

RUTH R. ADAMS

The Themes They Choose: Disadvantaged Students Take a Composition Test, Research Report 69-5 Office of Research and Evaluation of Ciar, 1969.

3. REVIEWS (Regular contributor to section "Previews and Reviews," File News

Reviews of the following films: (1970 to present)

"Denmark'43: The Nazi Occupation and Plight of the Jews"

"I'm Going To School Today" and "I'm Ready to Learn". Films from the Australian News and Information Bureau of Education

"Critical Homents in Teaching" Films designed for Teacher Training

"How Was School Today, Henrique?"

"Glasser on Schools"

"ACI Beginning to Read Films"

4. OTHER

"Afro-American at Work" (with Rubie S. Carter) Urban Community Kit.
Office of Curriculum Publications, NYC Board of Education, 1969

MEMBERSHIP IN LEARNED SOCIETIES

American Psychological Association
International Reading Association, National and Local Chapters
National Council for the Social Studies
National Council of Teachers of English
Phi Beta Kappa
Orton Society
Pi Lambda Theta
Reading Clinicians Group

APPENDIX

COMMUNITY AND COLLEGE SERVICE

Departmental Committees

Member of Educational Policies Committee -	1967-1969
Elementary Education Department	
Chairman of Ad Hoc Committee on Criteria	1967-1968
for Student Teaching Centers	
Secretary to Elementary Education Department	1968-1970
Chairman - Department Committee on Student Teaching	1967-1969
Nember Ad Hoc Committee to Study Skills	1967-1968
Hember of Ad Hoc Committee (and later) Chairman	1967-1968
of Ad Hoc Committee on the Role of the Clinical	
Instructor	Spring 1968
Chairman Orientation Committee for new student teachers.	June 1970
Chairman of Ad Hoc Committee on Evaluation of the	ound are
Undergraduate Program of the Elementary Education	
Department. Later wrote report with Prof. Brooks.	1060-1070
Member of Appointments Committee of Department of	1969-1970
Elementary Education	1060-1071
Committee on Committees - Department of Elementary	1969-1971
Education	1091
Member Appointments Committee - Dept. of Elementary Education	1971-present
Member of Curriculum Committee - Dept. of Elementary Education	1971-1973
Chairman, Bilingual Education Day at CCNY Summer -	1973

School of Education Committees

Committee for Tarrytown Conference for School of Education	1967
Committee for Tarry cown Contestance Los Education Committee on	1967-1968
Dept. representative to School of Education Committee on	
Student Teaching and Field Work	1968
Member of Affiliated Schools Committee	1968-1973
Chairman	
Chairman of Ad Hoc Committee to write a proposal	1971
for a learning Cooperative	
School of Education representative to Open Admissions	March 25, 1971
Conference and Co-Chairman of Workshop on Testing	
and Placement	
School of Education Ad Hoc Committee on Drugs and helped	Jan. 1971
plan two conferences	
Number of the Executive Council of the Urban Institute	
	1970-1972
of the School of Education	1970-1971
Member of the Advisory Committee of the Pilot Program	1970-1973
Number of College-Local School District Lisison	2010 2010
Committees in District 5 and District 6	

School of Education Committees ntinued)

Member of College-School-Parent Liaison Committees	1970-1973
at P.S. 129, 161, and 123 Number of Ad Hoc Committee to Develop an Arts Center	1970-1973
at P.S. 192 Represented School of Education at State Department of Education Conference in Albany on Changes in	December 1970
Teacher Certification in relation to the Preparation	
of Teachers of Reading Panel member at Convocation of School of Education's 50th	Dec. 3, 1971
Anniversary Member of Ad Hoc Committee - Competency Based Education	1971-72
Number of Ad Hoc Committee - Student Evaluation of	1971-72
Member of two Ad Hoc Committees Involved with Implementa- tion of Directions Committee Report	1971-72
Member of Committee on Evaluation of Brooklyn College Program of Competency Based on Education	1971-72

College Committees

City College Representative for the Annual Teacher Education	1969-1970
Conference Represented Dean Bortner at the City College Alumni Club	1968-1969
Awards Meetings at the Roosevelt Hotel Member of President Gallagher's Committee on Campus	1968-1969 1969-1970
Security Acted as Faculty Mentor for a group of Open Admission Freshmen and worked with Dean DeBerry - meetings at	1530-1971
college and home Elected to Faculty Senate	May, 1971

City University Committees

Participant and planner of College Discovery Conference City College Representative for the Board of Higher Education Interagency Committee on Open Admissions;	Dec. 14, 1968 1970-72
Co-Chairman of the English and Speech Committee	

Community Services

Speaker "Bilingual Institute for Parents and Community"	Nov. 9, 1967
Urban Affairs Committee Set up individual tutoring program (student teachers-pupils) at P.S. 161	1970-1971

RUTH R. ADAMS

Community Services (continued)

Part of Electord Survey for City College - Language Arts Consultant	March 1969	
Arranged with Professor Shapiro of the Music Department and		
with the Speech Department for Concerts and plays given		
ia local schools		
Mede two speeches for the Speakers Bureau of City College	Dec19, 1971	
at P.S. 104 Bronx	Jan. 24, 1972	
Spoke to Parents Association of P.S. 161	Oct. 13, 1971	
apone to raterica Association of the large Day at Harlem	Nov. 19, 1971	
Represented City College at College Day at Harlem		
Preparatory School	1971-1972	
Usefulness to Community: Organized and was in charge of a	19/1-19/4	
knitting club for neighborhood girls at P.S. 161		
Manhattan after school		

Administrative Responsibility

Course Chairman for Ed. 71711	1968-1971
Assistant to Chairman, Department of Elementary	Fall 1970;
Education	1971-72
Acting Program Head (with Prof. Natches) of	Spring 1971
the Graduate Reading Program	1972-1975
Chairman - Department of Elementary Education	13/5-13/2

Lectures

New York College of Music summer institute in the humanities - two lectures on children's literature, Summer 1967
M.Y.C. District 2: Workshop for New Teachers. Two lectures 4
demonstration. Reading in Intermediate School, Aug. 1967
Guest lecturer in Diagnosis and Correction of Reading
Disabilities course at Hunter College, Sept. and Oct. 1967
District 6 Orientation Conferences for New Teachers -
2 lectures on Causes of Reading Difficulties and
Reading in the Content Areas, Sept. 1957
Lecture given to para-professional group at Responsive
Environment Center in Brooklyn. Using Materials
Creatively, October 1967
Appeared on Channel 25, Educational Television, New
Developments in Reading, February 1968
Conducted colloquium at the Alfred Binet Center,
Muskegon, Michigan. Topic: Learning Disorders,
August 6 & 7, 1970.

Lectures (continued)

Conducted two day workshop for all first and second grade
teachers in Winchester, Kentucky. Topic: Preventing Reading
Pailure, August 18 and 19, 1970
Conducted seminar for Byran Hills District (Westchester)
Topic: Individualizing Instruction, March 1, 1971

Consultant Experience

College Discovery and Development Program - City University Consultant in English

Board of Cooperative Educational Services - Second Supervisory District of Westchester County - Consultant in Reading; Participant in Institutes and Workshops

District #2 N.Y.C. Study of Early Prevention of Reading Difficulties, Board of Education of the City of New York Corrective Reading Program

Non-Public Day Schools - Consultant - Corrective Reading Elmsford Study - conducted by City College. Consultant in Language Arts.

Title III, Umbrella 2 - Coordinator of Evaluation Project Curriculum and Teacher Growth

Institute for Educational Development - Evaluation of State-Funded Projects in New York City School Districts

Responsive Environment Program, Brooklyn, New York Curriculum
Consultant

Consultant to Friends Seminary, New York City
Consultant to Curriculum Division - Bd. of Education, N.Y.C.
Consultant for Institute for Educational Development in
District 14, Brooklyn, 1971-1972

Participation in Meetings of Professional Organizations

Speaker for Sigma Alpha Honor Society of the Baruch School
How Far Behind the Times is Modern Education - March 31, 1967

Discussion Moderator - Lake Minnewaska Conference (College
Discovery), Nov. 1966

1967 Summer Workshop Institute - Board of Cooperative Educational
Services - Planning Committee. 4 Lectures June, July 1967

Conference Participant in Washington, D.C. at the Children's
Hospital, Neurological Implications of Learning Disabilities, April 1967

Faculty Conference, J.H.S. 167 M. Topic: A New Look at Reading on
the J.H.S. Level, Feb. 27, 1968

RUTH R. ADAMS

Participation in Mestings of Professional Organizations (continued)

Midwinter Conference of Westchester Board of Cooperative Médicational Services. Keynote Speaker: Reading and Disadvantaged Children, February 15, 1968 District & Conference for Association of Grade Teachers: Reading in the Content Areas, March 9, 1968 Speaker at Manhattan Chapter of International Reading Association: Concept Growth of Young Children, March 13, 1969 ASCD Conference. Chicago. Participated in Seminar on Micro-teaching as Related to Supervision, March 14-17, 1969 International Reading Association Annual Meeting. Kansas City Missouri. Paper read: A Study in Attention and Concept Growth of Young Children, May 1969 International Reading Association Conference in Atlantic City (Sessions on Micro-teaching), April 22, 1971 Participant in Conference Puerto Rican Students at Radcliffe and Harvard. Harvard-Radcliffe Club Program, November, 1970 Bureau of Child Guidance Conference Speaker. Topic: Overview of Learning Problems on the Secondary Level - June 1971 Speaker at IRA Conference in Detroit. "Responsive Environment and Creative Approaches in Language Arts". - May 1972 Speaker at AAUM Education Workshop. "Do All Roads Lead to Reading?" - May 1972 Speaker at International Reading Association Meeting: "Variables that Speaker at TTT Colloquium - "Variables That Affect Reading Program" - Nov 1972 Speaker at Open Education Conference at City College. "The Administrator's Role in Reading Programs." - May 1973

Unpublished Works of a Service Nature

"Programs for the Disadvantaged: A Report on the 1966 Teacher

Bducation Conference." Teacher Education News and Notes, Jan. 1967

"Role of the Tutor in the College Discovery Program." College

Discovery News, Dec. 1968

"Project Director's Report on the Evaluation of Umbrella II Projects

in Curriculum and Teaching," June 1969

In Curriculum and Teaching, June 1969

Selected Materials for Use with Retarded Readers - an annual

Selected Materials for Use with Retarded Readers - an annual

(This printed publication is sent out nation-wide each year.)

(This printed publication is sent out nation-wide each year.)

Interaction - Video-tame for developing communication skills.

City College Television Studio. 1970-71

City College Television Studio. 1970-71

"Validity of Existing Measures of Beginning Reading in Relation to the Distar Reading Program" - January, 1971. (for the Institute of Educational Development, NYC)

RUTH R. ADAMS

Unpublished Works of a Service Nature (continued)

"An Evaluation of District Decentralized Projects ESEA Title I Programs in Community School District 14, N.Y.C." (for the Institute of Educational Development) August 1972 Bilingual Reading Lessons at P.S. 192 - Video tape for teacher training. Feb 1973

WURKS IN PROGRESS

Book (is finished and will be published by the Anti-Defamation League of the B'Nai Brith. Mr. Stanley Wexler is the editor of publications): Reading-Preventing Failure: Fostering Success.

(See attached letter.)

Grants and Contracts Awarded

National Right to Read Technical Assistance Team Member -Northeast Region of U.S. Jan. 1972 - Aug. 1973 Urban Teacher Corps Grant for Training Bilingual Interns - May 1973

Courses Taught at the City College

Ed.	71706	Diagnosis and Treatment of Learning Disabilities
md.	71711	Teaching of Reading (Advanced Course)
		Course Chairman Selection and Development of Reading Materials
Rd.	71718	Diagnosis and Treatment of Reading Disabilities
Ed.	71715	Diagnosis and lieucenticums in
Bd.	71716.1	First and Second Practicums in
Kd.	71716.2	Reading Disabilities
Bd.	72716	Advanced Practicum in Reading Disabilities
Ed.	74795	Administration and Supervision of Reading Programs
Ed.	111-112	Commission and Teaching in Elementary Education
Ed.	175	Teaching of Reading (undergraduate course) Curriculum Enrichment Through Children's Literature
Ed.	71705	Curriculum Enrichment Intodyn ontre
Ed.	75701	Research Seminar

UNITED STATES DISTRICT COURT

JA 72

EASTERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL 19, et al.,

74 Civ. 783 (JBW)

Plaintiffs,

AFFIDAVIT

-against-

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT NO. 14 OF THE CITY OF NEW YORK, et al., OF

Defendants.

CARMEN DINOS

STATE OF NEW YORK)

COUNTY OF NASSAU)

CARMEN DINOS, being duly sworn, deposes and says:

achievement of Puerto Rican children the paramount concern of my professional life since I began teaching in Puerto Rico in 1941. I taught at all levels of the educational system in Puerto Rico, from elementary school in rural areas to the University of Puerto Rico in Rio Piedras. My educational training includes a B.A. in ducation, an M.A. in Linguistics (Teaching English As a Second Language) and I am presently a doctoral candidate at the Fordham University Graduate School of Education for a doctorate in Urban Education. After leaving Puerto Rico, I became involved in the education of Puerto Rican children in New York City. I was Supervisor of the National and Local Educational Program of the Migration Division of the Commonwealth of Puerto Rico from 1963 to 1968. I then became directly involved with the New York City school system as

teachers for the Board of Education of the City of New York

from 1968 to 1970 and also served as special assistant to the

President of the Board of Education, Joseph Monserrat. Since

1970 I have been an Assistant Professor at Brooklyn College.

I first taught in the Puerto Rican Studies Department. At the

request of the College I developed and initiated the Bi-Lingual

Program for the College which includes the Bi-Lingual Teacher

Training Program of the School of Education, and I am presently
an Assistant Professor in the School of Education.

- problems of the Puerto Rican children in District 14. I have been a consultant in the evaluation of federally-funded bilingual programs in the New York City School system, and in this capacity I participated in the evaluation of the Title VII bi-lingual program in District 14 in 1972. In the process of this evaluation, I became aware that there were many areas of the Program that needed substantial improvement in order to meet the needs of the Spanish-speaking children of the District.
 - 3. Because of my concern about the need for direction and improvement of the educational program for the Puerto Rican children of District 14, the Dean of the School of Education at my request arranged with the Community Superintendent to place 23 students from our Bi-Lingual Teacher Training Program into the District schools in the Fall of 1972. Under these arrangements, which are commonly made between the School of Education and local school districts, the School of Education students seceive laboratory experience credit for observing

and assisting classroom teachers in a Bi-Lingual program in elementary schools. However, District Superintendent William Rogers assigned the students to schools in which there were no bi-lingual programs operating. In view of this fact the students were withdrawn at my request at the end of the term and placed in District 32 where they were afforded the opportunity of helping to provide bi-lingual instruction. As a result of this experience I developed grave reservations about the concern of the administration in District 14 for the education of Puerto Rican children.

.

- 4. I have discussed the situation at P.S. 19 with counsel for the plaintiffs. I understand that plaintiff children have been attending split-session classes for the first, second and third grades, and have never had comprehensive bilingual instruction. Additionally, I am familiar with the Community School Board's plan and how it would affect the fourth and fifth grade classes at P.S. 19.
- concern for both the unique educational problems of Puerto Rican children and those they share with other disadvantaged minorities, I cannot emphasize strongly enough how harmful the effect of the double transfer would be on these Puerto Rican children, considering their previous wholly inadequate educational experience. In my opinion, for the reasons set forth below, such transfers would irreparably damage the opportunity of these Puerto Rican children to receive an adequate elementary school education.

JA 75

6. There can be no doubt that the amount of schooling and the actual length of the instructional school day has a determining effect on the education of the child. In the case of these children, the substantial amount of instructional time that has been lost because of split-session classes cannot help but have retarded their educational development. For this loss to have occurred in the early years of elementary education is especially harmful. These are the years when experiences had and instruction received in verbal and writing ability, reading comprehension and mathematics should be at a maximum. This is equally true for the absorption of other subject areas that our society and the children's own personal well being requires: social studies, science, health education and the arts. Furthermore, this loss of time drastically increases the chance that these children will be permanently hampered in their ability to properly master advanced learning.

- 7. Because these Puerto Rican children come from deprived socio-economic backgrounds, the continued maintenance of short-time education year after year and grade after grade until many hundreds of these children were so badly harmed for the first half of their elementary school education is an inexcusable educational practice.
- 8. This past educational deprivation is compounded by the present plans of the District Board. To transfer these children out of their neighborhood school to another school that is admittedly obsolete is educationally, physically and psychologically harmful. To transfer them again for the sixth grade to another school in a third neighborhood further compounds the injury. The deleterious effect of such transfers is well-known educationally and has been reported by various studies done by

state in which children can learn effectively they need security, stability and a sense of belonging which can be best developed in a setting of physical continuity. When they must transfer to another school in another neighborhood they lose this sense of psychological stability and require a length of time to adjust to their new surroundings. For the children of P.S. 19 this further time lost to their educational development exacerbates the original loss caused by split-session classes.

9. The children also suffer educationally because of the negative impact of this transcience on the involvement of the parent in the child's education. In my many years of experience in Puerto Ricc, I witnessed a long history and tradition of close ties, trust and cooperation between Puerto Rican parents and school staff. When I became involved in education in New York City, I realized that cultural differences often made it impossible for Puerto Rican parents to become involved in school matters in the fashion to which they were accustomed. I also realized that often the school staff did not understand this and interpreted the different behavior as lack of interest and involvement. These cultural barriers must be overcome if the parental involvement necessary to the educational development of the child is to take place. To be able to bring about this understanding, it is not only desireable, but necessary, for parents and staff to have sufficlent time to get to know each other and develop the kind of ties and understanding that will enhance the children's learning capabilities. The transfer of these children so that

school years will place severe obstacles in the path of the development of this crucial involvement. Further, the transfer to P.S. 122 over the protests of the parents of P.S. 19 practically precludes the kind of cooperation that is necessary for this vital parental involvement.

- 10. The child's education is additionally harmed by the disorganizing effects of the double transfer on the teaching staff. Education is a developmental process. As a teacher, I know that in order to effectively educate children, teachers need immediate access to information about the history of the performance of the child and the child's previous classroom experience. Written records of past performance are an inadequate substitute for the availability in one physical setting of personnel who previously interacted with the child or his family. Teachers also need to confidently expect the reinforcement and amplification of their present efforts in future grades. They must feel that they are part of a process - a link in a chain. The division of the elementary school education into three separate segments isolates the teaching staff from each other and prevents the necessary cohesiveness and interaction. The loss of this interaction frustrates teachers' efforts and negatively affects the child.
 - from the lack of any program which attempts to take cognizance of and educationally respond to the reality that their everyday life is conducted almost entirely in Spanish. In order to educate these children effectively, schools must provide a coordinated, developmental educational program that will take this reality into account in a positive way and stimulate learning. Of special concern to me is the fact that I do not see

100

this type of educational program being developed and offered to those children to offset and redeem the educational harm that forced transfers would cause. I see no sound instructional program that will give these children a real opportunity to acquire basic skills as well as develop the proficiency in the English language which will allow them to compete on an equal basis with the other children in the District and in the city.

plan to transfer these children to P.S. 122 will irreparably harm their education.

CARMEN DINOS

Sworn to before me this 30th day of July, 1974.

NOTARY PUBLIC

A

PATRICIA VERCATA

NOTARY PUBLIC, STATE OF MEW YORK

No. 31-4520545

Cert. Filed in New York County

Commission Expires Merch 50, 1976

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL 19, et al.,

74 Civ. 783 (JBW)

Plaintiffs, : AFFIDAVIT

-against-

: OF

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT NO. 14 OF THE CITY OF NEW YORK, et al.,

: MICHAEL STEWART MCCOLGAN

Defendants.

STATE OF NEW YORK)

SS.:

COUNTY OF NEW YORK)

MICHAEL STEWART McCOLGAN, being duly sworn, deposes and says that:

- 1. I am an educator who has specialized in the education of children who are learning a second language. received my B.A. from Marquette University in 1963 and my Ed. D. from Columbia University Teachers College in 1972 with specializations in English as a second language, bilingual education and educational administration. I have experience both teaching and administering bilingual educational programs, which is set out in my attached resume.
- 2. I have had direct experience with the educational problems of the New York City school system, having taught and administered bi inqual educational programs in the Bronk and Man hattan, and this September I will assume the position of bilingual education for the elementary and intermediate schools

in Community School District #23 in Brooklyn.

- 3. I have discussed the facts in this case at length with counsel for the plaintiffs.
- 4. In this affidavit I will support two contentions: that pupil transiency is detrimental to scholastic achievement, particularly reading; and that minority language community children, such as Puerto Ricans, are more greatly disadvantaged by the ill effects of transiency than other children.
- 5. Educators and the Board of Education have long recognized the deleterious influence of pupil transitary on scholastic achievement. Although it may seem plausible that homogenizing the city school curriculum would forestall the malignant effects of transiency, this has not proved to be the case. The Board has conducted its own studies which showed convincingly that transient pupils had significantly and progressively lower reading levels than non-transient pupils.
- Research and Statistics of the Board of Education published the 1.

 Kasindorf study of the untoward effects that pupil transiency had upon their school performance. In the Introduction to the

^{1.} Blanche R. Kasindorf, "The Effect of Pupil Transiency on Pupil Functioning," Bureau of Educational Program Research and Statistics, Board of Education of the City Of New York, March 1963.

report Kasindorf makes the following general observations: "On an individual basis pupil transiency may be the partial or complete cause of many a child's educational and social maladjust—
2.
ment." High transiency was defined in the report as admission to a city school three or more times.

7. Additionally, in 1968 the Office of Educational Research of the City School District of the City of New York reported the reading test results of the 1967-1968 testing, noted the Kasindorf and two similar studies and concluded:

In every year since 1962 one out of every five or six pupils in New York City schools was transferred, admitted or discharged. This high rate of pupil mobility has an impact upon the learning of the children who are moving from one place to another and from one school to another.

Research studies conducted by the Office of Educational Research show that the more frequently a pupil moves from one school district to another, the lower his comparative reading achievement will be. Three studies were conducted by (a) Kasindorf, (b) Frankel and Forlano, and (c)Justman. Based on standardized reading test data the performance of transient and non-transient pupils in disadvantaged areas in New York City were compared. The Justman study, based on 934 sixth grade pupils, found that the pupils who attended four or more schools during elementary school years functioned 12.1 school months below grade level in the third grade, and by the time they reached the sixth grade the per-

^{2.} Quoted in a release from the Office of Education Information Services and Public Information, Board of Education of the City Of New York, May 25, 1961, p. 2. (The Kasindorf study is no longer available from the Board of Education, but is reported in the New York Herald-Tribune of April 15, 1963.)

formance of these same children was 16.6 school months below grade level in reading achievement. On the other hand, those pupils of stable residency who attended the same elementary school during the six-year period were 2.4 school months below grade level at the third grade but they achieved 1.7 school months above grade 3 level when they were in the sixth grade.

- deal with the reports on pupil transiency: transiency is the purportedly sole variable. No attempt was made to descry varying effects of transiency among different pupil populations. That is, if transiency affected one group of students more than another group, it is not retrievable from the previously mentioned studies. In my opinion, the deleterious effects of transiency are more pronounced for minority language group children than for other groups of children.
- 9. Minority language group children are children whose ethnic and speech community is bilingual, the members of which are often, if not most often, dominant in the language other than English and many of whom are monolingual in that language or have severe difficulty with one or more of the recognized language competence skills in English. Among New York City school populations these children are more likely to have difficulties with English severe enough to affect their scholastic achievement or to deprive them of effective participation

^{3. &}quot;Summary of Citywide Reading Test Results for 1967-68," Office of Educational Research, City School District of the City of New York, November 1968, p. 6.

in the city school program altogether without provision of alternative educational programs than other groups of children.

10. Such minority language group children are highly represented at a school that is 95% or more Puerto Rican and Hispanic like P.S. 19, and in fact P.S. 19 has a high percentage of pupils with English language difficulties (Categories I and II according to the citywide Language Ability Scale rating).

As of June 1974, 904 of the 1461 pupils enrolled at P.S. 19

--62%--had English language difficulties.

require consistency, stability and continuous developmental operation over a period of consecutive years. These programs whether merely supplemental, compensatory language programs such as English as a Second Language programs or whether comprehensive alternative educational programs such as bilingual education services, require a great deal of pre-planning, supervision and constant evaluation to be successful. Programs dealing with language deficiencies require all the sophisticated and technical and practical expertise that are needed by programs for the gifted, guidance programs, or programs for preschool children. In my opinion, pupil transiency inhibits the necessary continuity and forecloses the possibility of developing successful programs for children with English language deficiencies.

October 1973 Language Ability Scale ratings. Board of Education.

^{5.} This is evident in the hundreds of bilingual program proposals submitted annually to federal, state and local educational bureaus and agencies. It is also evident in the failure of the public school system to experience success in the schooling of language minority children, chiefly the Puerto Rican school populations, before the advent of broad implementation of carefully designed and maintained programs.

- way. Generally, the importance of parental involvement for any group of children may or may not be related to the school success of their children. However, for children who are not oriented to the English-speaking environment and culture of their schools, and whose development of self-concept and affective growth are at least as important as their cognitive development and academic progress, such as minority language group children, parental influence and assistance are regarded by professional educators as significant to scholastic success.
- down by public educational agencies for bilingual education programs. The federal government, in its ESEA Title VII guidelines, the State Education Department in its state law Chapter 992 (1974) guidelines, and the Board of Education, in its guidelines for programs implemented under Program 30 Module 5 and Program 76 Module 2B (1974-75) all require parental involvement in the educational programs funded by their agencies.
- education, I conducted an interview survey of school principals in

 New York City Community School District #6. An oft-repeated

 comment by the principals concerned the need to involve the parents

 of Hispanic and other language minority children in school decisions

 and in the life of the school generally. In many cases, limited

 parental involvement was cited as a large influence on the school

 dysfunctions of Hispanic children and on many children's lack of

 6.

 academic success.

^{6.} Michael Stewart McColgan, "Consultant's Report on Pre-Planning for Bilingual Education, Community School District 6," District 6, New York City, June 30, 1974, pp. 4-23, 25-27.

15. If the parents and children are repeatedly assigned to different schools, there can be expected to result a lack of coherent leadership and stability among schools' parental involvement in committees and advisory groups, in parents and parent-teacher associations, and in workshops and in-service courses. In addition, parents who are paraprofessionals may wish to clange schools with their children, reducing their own effectiveness as well as that of the school and district paraprofessional program. Parents whose children change schools often are less likely to come to know the teachers of their children and the various staff members of the school with whom it is usually recommended by educators that they maintain communication, such as guidance counselors, attendance teachers, medical personnel, and supervisors. In the case of children who are not themselves oriented to the school environment and to school services, such as minority language children, this disorganization and lack of organized support of the parents in the school program may likely be severly deleterious, more so than if the children were part of the English dominant culture and more easily able to participate we singfully and effectively in the school.

above, the proposed transfer plan would result in irreparable injury to the educational development of the children of P.S. 19.

MICHAEL STEWART MCCOLGAN

Sworn to before me this

2 day of August, 1974

MOTARY PUBLIC

Franchist Statement Statem

Personal

Hichael Stewart hecolgan Name:

December 6, 1942 Birth date: Oal: Park, Illinois Birth place:

323-34-6083 Social Security no .: Single Harital status:

Education

EdD. Columbia University, 1977 Fields: English as a record language and Effloqual education

Educational adalation of the

Dissertation: "The Change Frent and Forestional Innovation, with

Special Property to the Establishment of a Littingial Subscience In an Orbin Senosi Sycurses

Supplementary graduate studies is todayas between try (co estative

Hterature) and deater coing, C.U.M.Y. (Ca.) A3, Marquette University, 1963

Administrative experience

Regional college accordingtor, Allington Annillary Teachers 1973 Program, University of Program kice, kin placing

Coordinator, The offingers Subschool, Backers juntos with school. 1969-72 The from, Por York

Assistant to they admit therefor, therein hech webood annex, 1969 The Brown, that wert

Principal, as. Paul's choic eventor aches, the Year 1968

Adular twice, we that entoring property of the derivatively select, 1964-66 St. Fail, primel, ft. Poles school, Jarried bace, Sto. Feter and Paul school, all of thicago, this said

Teaching experience

1972-73 Assistanc oreforcer of English, University of Pearso Rico, regional college of Pone

Assistant Profusion of Engited, Catholic University of Puerto 1972 kico, Perc.

Teacher of English as a second language, Formis high school and 1967-69 Borris high school above, The Scool, Ell York

Teacher of Empirich, marris evening high school, The Brook 1968

Street teacher, incline as a pasend long was, Sugar in the City 1567 (O.E.O. -tended premiers), they York

1966-67 Toucher of English, Queens vocational high school, Long Island City, Ray York

1964-66 Teacher of English, Gordon technical high school, Chicago

Organizational experience

- 1973 Originator and editor, English Policy and Practice, Ponce,
- Puerto Rico
 1371-75 New York State Teachers of English to Speakers of Other Languages
 (MYS15501): elected number of the executive board
- 1971-72 Editor, htt fesst Idion; chairman, Hystesot publications committee; concheirman, Hysteson objectly linker committee
- 1972 Ellingual education conference sponsored by The Billingual School and New York Bulversity: masher of the planning condictee; are senter of tight in possi
- 1972 Eilingual coloration conference sport and by community school district 3 and fordier University; member of the alaming bourd; presenter of arger in sand
- 1972 Hew Year form (ESO), conference: member of the planning condition; presences or popular in such
- 1971 Rillings. I admitted conforms: sponeouse by Tariford Deliversity and the law bridges fredicts presented of poneous part
- 1971 Here very these conferences process or of paper in panel

References

- Ha. And dulle Albert of you teneral Emperations of Emplish, tence hegion,
- Ms. Clairs C. Astronomy and approximate of removal from Tisel, the sale of the contract of the
- br. Edward J. Lare of a ray dissertance, advise, 617 best fed Acc., best fock, U.Y.
- Dr. Common deliantes to a City over, to the court of trailing the Court of the cour
- Dr. Pesi h. tourses to a refactor for tornis hope resear. Inches

Enlanted ad different to the second of the second of the

- 1972-19 Fleated to the of the exemption money of recents him, think
- Daction of bits your suppose movement set out seat senses and cuttographics of the season set (modeling)
- Billingual education remembered for Applic of now horn, inc. or the Karma Karma Light intends the tensor for two in the Case Academy at Manual of contractor of the Gang of the Lock
- Editor of the presondings, the Third Limits Billings of Ploutewest Conference

PARENTS' COMMITTEE OF PUBLIC SCHOOL 19, et al

Plaintiffs,

-against-

THE COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT NO. 14 OF THE CITY OF NEW YORK, et al Defendants

AFFIDAVIT

74 CIV. 783

(J. B. W.)

DOXEY A. WILKERSON, being duly sworn, deposes and says, that:

- education of minority children for my entire professional life. I am presently Vice President of Mediax Associates, Inc., a staff-development firm that contracts with school district to train teachers in educating inner-city and other children. Prior to my association with Mediax, I was professor of education at Yeshiva University, where I taught from 1963-73 and now hold the title Professor Emeritus at that institution. I earned the Ph.D. degree in education at New York University in 1958, having previously taken doctoral studies in education at the University of Michigan in 1933-34; and I earned the Master's degree in education in 1927 at the University of Kansas. To fully establish my expertise in this area, I have attached a copy of my Curriculum Vitae to this affidavit.
- 2. I am familiar with the facts in this case, having read the Complaint and spoken at length with counsel for the plaintiffs.
- 3. The deleterious impact of short-time and split-session classes on the educational development of children is beyond dispute among professional educators. The effect of the loss of the equivalent of one day of classes each week is particularly harmful during early childhood education because it is in these first few years that the fundamental skills of reading, writing and arithmetic are taught. But

equally important during those years is the exposure, for the first time for many children, to the areas of social and physical sciences, to music and art, and to the socializing influence of disciplined group participation.

- 4. The loss of school time to minority children is an even greater handicap in their further education than it is for most children. The effect of this loss of education is further to reinforce the negative image many teachers hold of minority children; and, in return, the children soon learn to fulfill this negative image in a continuing downward spiral of poor education.
- 5. I believe that there is no justification for shorttime classes in a modern educational program even for a short period of time, much less for a fourteen-year period.
- problem, however, has compounded the injury. Their first attempt to overcome the crowded situation at P.S. 19 by sending the sixth grade to P.S. 17 in 1973 was a very poor educational decision. Any transfer from one school to another school under a different administration and in a different neighborhood has a dislocating effect on chidren. It takes a long time for the student to adjust to his new surroundings and interrupts the educational process. While our educational system provides for a number of transfers and hiatuses, these moves are for three- or four-year periods, as in the 4-4-4 pattern of school organization recommended about a decade ago by the Allen Committee and adopted by the Board of Education.
- a single year does not make educational sense. As a publication of the Board of Education, itself notes: "Data show that when a child moves from school to school several times during his elementary school years, his education suffers." (Office of Educational Research, City School District of the City of New York, SUMMARY OF CITYWIDE READING TEST RESULTS FOR 1967-1968, November, 1968, p. 8.)

- Now the District Board has decided to move the fourth and fifth grades to P.S. 122. This decision can hav devastatingly dislocating effect on the children. Students at P.S. 19 now will be attending three separate schools in ther: first dix years of education. These children have seeming. Deen singled out for a poor educational experience. First, they are placed in a completely segregated school with all the concomitant stigma. Second, they are given three years of split-session classes, and in effect, lose a whole half-year of educational instruction over that period. Third, they are sent for one year for their sixth grade to a totally different school. And now, they are being injured tarther by being transferred for their fourth and fifth grades. They have little chance of surviving that experience without substantially further stigmatizing impact and without suffering from an abbreviated and dislocated educational process.
- The transfer to P.S. 122 has no redeeming qualities. On information and belief, the school has been partially closed for four years now pending the construction of a new school. The school was closed because it was an obsolete facility. While educational facilities are not the most decisive influence determining the quality of the educational experience, they are important. P.S. 122 is just not an appropriate site for these children who need the best facility and need a comprehensive remedial program to overcome the educational and stigmatizing handicap of their previous school experiences.

10. I believe that these children will be irreparably injured if the proposed transfer to P.S. 122 takes place.

DOXEY A. WELKERSON

Sworn to before me this

day of August 1974

Vigere R Carpenter

Mediax Associates, Inc. 21 Charles Street Westport, Conn. 06880

MAIN PROFESSIONAL INTERESTS

Education of teachers for inner-city schools; compensatory education; curriculum development

EDUCATION

9,

Public Schools of Kansas City, Mo. and Kansas City, Kansas University of Kansas, A. B. (English), 1926
University of Kansas, M. A. (Education), 1927
University of Michigan (Doctoral study in Secondary Education), 1933-34
New York University, Ph.D (Higher Education), 1958

PROFESSIONAL EMPLOYMENT (noting last position at each institution)

Virginia State College, Professor of Education; Chairman, Department of Secondary Education, 1927-1935 Howard University, As ociate Professor of Education, 1935-1943 President's Advisory Committee on Education, Research Associate, 1937-1939 Carnegie-Myrdal Study of the Negro in America (An American Dile a), Research Associate, 1939-40 (on leave from Howard University) United States Office of Price Administration, Education Specialist, 1942-43 (on leave from Howard University) THE PEOPLE'S VOICE, Executive Editor 1944-48 Jefferson School of Social Science, Director of Curriculum, Bishop College, Professor of Education; Director, Division of 1948-1956 Education, 1959-60 Yeshiva University, Professor of Education, 1963-1973 Mediax Associates, Inc., Vice President, 1973-

CONSULTANT RELATIONSHIPS (partial list)

National Scholarship Service and Fund for Negro Students,
National Jewish Congress, U.S. Office of Education, National
Institute of Education, Mid-Continent Regional Educational
Laboratory, National Laboratory for Higher Education, AfroLaboratory, National Laboratory for Higher Education, AfroAmerican Institute - New York University, Middle States
Association of Colleges and Secondary Schools, Response to
Educational Needs F oject-District of Columbia Public Schools,
Educational Testing Service

PROFESSIONAL AFFILIATIONS

American Educational Research Association
National Society for the Study of Education
Association for Supervision and Curriculum Development
Children's Television Workshop, Board of Advisors, Research
Committee
Little Red School House, Chairman, Board of Directors
Foundation for Change, Board of Advisors
New Future Foundation, Board of Advisors
The Teachers Incorporated, Board of Directors

CIVIC AFFILIATIONS

The Carver Foundation of Norwalk, President Norwalk Drug Abuse Committee, Board of Directors National Association for the Advancement of Colored People Greater Norwalk Community Council

BOOKS AND MONOGRAPHS

- Special Problems of Negro Education. (President's Advisory Committee on Education, Staff Study No. 12) Washington: Government Printing Office, 1939. Pp. 171.
- Agricultural Extension Services Among Negroes in the South.
 Washington: Conference of Presidents of Negro Land Grant Colleges, 1942.
- Public School Segregation and Integration in the North.

 (Report of the Commission on School Integration)

 Washington: National Association of Intergroup Relations
 Officials, 1964. Pp. 104.
- The World of Education: The Educational Program of Mobilization for Youth, New York: Mobilization for Youth, Inc., 1964. Pp. 65.
- Compensatory Education for the Disadvantaged. New York:
 College Entrance Examination Board, 1906. Pp. 299. (Coauthor with Edmund W. Gordon)
- Matching Students with Colleges (An Evaluation of the Classification and Matching Procedures of (MSSFNS). New York:
 National Scholarship Service and Fund for Negro Students,
 1966. Pp. 28+.
- The NSSFNS College Assistance Program, 1964-1966: Description and Appraisal. New York: National Scholarship Service and Fund for Negro Students, 1967. Pp. 55+. (Supported by U.S. Office of Education, Department of Health, Education and Welfare, Contract No. OEC-1-7-078090-2875).

- The Title I Program of District 13 -- Description and Appraisal:

 1967-68 (Board of Education of the City of New York). New
 York: Ferkauf Graduate School, Yeshiva University, 1968.

 Pp. 147+.
- Reforming Urban Schools, Publication by Goodyear Publishers pending (Co-author with Allan C. Ornstein and Daniel U. Levine).

CHAPTERS IN BOOKS

- "Education and Social Problems", in Joseph Roucek (ed.), Sociological Foundations of Education. New York: Thomas Y. Crowell Company, 1942. Pp. 771.
- "Freedom -- Through Victory in War and Peace", in Rayford W. Logan (ed.), What the Negro Wants. Chapel Hill: University of North Carolina Press, 1944. Pp. 352.
- "Improving College Performance in Integrated Education", in Lawrence C. Howard (ed.), Interinstitutional Cooperation in Higher Education. Milwaukee: Institute of Human Relations. University of Wisconsin, 1967. Pp. 555 (Co-author with Edmund W. Go don).
- "Selected Readings on the Disadvantaged Child", in Jerome Hellmuth (ed.), Disadvantaged Child, Vol. 1 Seattle: Special Child Publications, 1967. Pp. 499.
- "The Negro School Movement in Virginia: From 'Equalization' to 'Integration', in August Meier and Elliott Rudwick (eds.), The Making of Black America, Vol. II. New York: Atheneum, 1969. Pp. 507.
- "The Project Beacon Training Program", chapter 12, Pp. 257-274, in Bruce W. Tuckman and John L. O'Brien (cds.), Preparing to Teach the Disadvantaged. New York: The Free Press, 1969. Pp. 311, (Co-author with Julian Roberts).
- "Compensatory Education?", in Stella Chess and Alexander
 Thomas (eds.), Annual Progress in Child Psychiatry and
 Child Development. New York: Brunner/Mazel, 1969. Pp. 700.
- "The School, Delinquency, and the Children of the Poor", in Paul Graubard (ed.), Children Ac inst Schools. Chicago: Follet Educational Corporation, 1969. Pp. 376.
- "The Failure of Schools Serving the Black and Puerto Rican
 Poor", in Annette T. Rubinstein (ed.), Schools Against
 Children: The Case of Community Control. New York:
 Monthly Review Press, 1970, Pp. 299.

- "Compensatory Education: Defining the Issues", in Jerome Hellmuth (ed.), Disadvantaged Child, Vol. 3. New York: Brunner/Mazel, 1970. Pp. 466.
- "Compensatory Education", in Sheldon Marcus and Harry N.
 Rivlin (eds.), Conflicts in Urban Education. New York:
 Basic Books, 1970. Pp. 196.
- "Compensatory Programs Across the Nation: A Critique".
 in A. Harry Passow (ed.), Reaching the Disadvantaged
 Learner. New York: Teachers College Press, 1970. Pp. 360.
- "Compensatory Education and Powerlessness", in Dwight Allen and Jeffrey Hecht (eds.), Controversies in Education (Publication by W. B. Saunders Co. pending).
- "Powerlessness and Ghetto Education", in Marvin Leiner (ed.), Children of the Cities: Education of the Powerless (publication by New American Library pending).

ARTICLES IN JOURNALS (Partial list)

- "The Vocational Choi es of Virginia High School Seniors", Virginia Teachers Bulletin, 7: 1-17, November, 1930.
- "A Racial Index Number of Relative Educational Efficiency for Virginia County and City Systems of Schools", Virginia Teachers Bulletin, 9: 1-5, 8-12, November, 1932.
- "Racial Differences in Scholastic Achievement", Journal of Negro Education, 3: 453-457, July, 1934.
- "A Determination of the Peculiar Problems of Negroes in Contemporary American Society", Journal of Negro Education, 5: 324-350, July, 1936.
- "Educating Negro Youth for Occupational Efficiency", National Educational Outlook Among Negroes., October, 1937, Pp. 6-9; December, 1937, pp. 6-10.
- "American Caste and the Social Studies Curriculum", Review of Higher Education Among Negroes, April, 1937, pp. 67-74.
- "The Vocational Education, Guidance and Placement of Negroes in the United States", Journal of Negro Education, 8: 462-488, July, 1939.

- "The Role of the Negro College on the Home Front", Negro College Quarterly, 1: 15-20, March, 1943.
- "The Negro Press", Journal of Negro Education, 16: 511-521, Fall, 1947.
- "Negro Culture: Heritage and Weapon", Mainstream, August, 1949, pp. 3-24.
- "Conscious and Impersonal Forces in Recent Trends Toward Negro-White School Equality in Virginia", Journal of Educational Sociology, 32: 402-408, April, 1959.
- "The Internal Process of Integration" (review of The Integrated Classroom, by H. H. Giles), Journal of Negro Education, 29: 165-167, Spring, 1960.
- "Class Differences in Our Schools" (review of Education and Income, by Patricia C. Sexton), Journal of Negro Education, 31: 155-157, Spring, 1962.
- "Prevailing and Needed Emphases in Research on the Education of Disadvantaged Children and Youth", Journal of Negro Education, 33: 346-366, Summer, 1964.
- "School Integration, Compensatory Education and the Civil Rights Moveme : in the North", Journal of Negro Education, 34: 300-309, Summer, 1965.
- "Programs and Practices in Compensatory Education for Disadvantaged Children", Review of Educational Research, 35: 426-440, December, 1965.
- "Report from the Slum" (review of Dark Ghetto, by Kenneth B. Clark), Teachers College Record, 67: 374-378, February, 1966.
- Compensatory Education", Southern Education Report, 4: 2-9, November, 1968.
- "Blame the Negro Child!", Freedomways, 8: 340-346, Fall, 1968.
- "The Ghetto School Struggles in Historical Perspective", Science and Society, 33: 130-149, Spring, 1969.
- "Understanding the Black Child", Childhood Education, April 1970, pp. 351-354.

"Teaching the Black Experience", Teaching and Learning (Journal of the Ethical Culture Schools of New York City), 1971, pp. 351-354.

"How to Make Educational Research Relevant to the Urban Community", Journal of Negro Education, 41: 299-302, Fall, 1972.

PERSONAL

Born in Excelsior Springs, Missouri, 1905 Married to Yolanda B. Wilkerson, Teacher of Mathematics Residence: 34 Dock Road, South Norwalk, Connecticut 06854

November, 1973

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF No. YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL # 19, et al.,

plaintiffs,

74 Civ. 783

(J.B.W.)

-against-

AFFIDAVIT OF JULIAN NESKI

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT #14 OF THE CITY OF NEW YORK, et al.,

Defendants.

STATE OF NEW YORK

ss.:

COUNTY OF NEW YORK)

JULIAN NESKI, being duly sworn, deposes and says, that:

State of New York, and a Fellow of the American Institute of Architects. I am familiar with the design and construction of school buildings, having been the Design Architect for Junior High School No. 43 and Public School 506 in Brooklyn, New York; I am therefore aware of Building Code requirements for educational facilities in the City of New York.

I am presently a partner in the firm of NESKI ASSOCIATES ARCHITECTS, 18 East 53rd Street, New York, New York.

I received my professional education at Rensselaer Polytechnic Institute, and have taught in the Departments of Architecture at Pratt Institute, Cooper Union and Columbia University.

To fully establish my qualifications, I have attached a copy of my firms' Curriculum Vitae to the Affidavit.

illuminated with proper phosphorescent

JA 100

backgrounds;

- e) Doors leading to central exit stair do
 not conform to Section C26-604.4 of the Building
 Code lacking the necessary fire protection
 rating and also obstruct passage on the landings;
- f) Doors from classrooms to the corridor do
 not conform to requirements of Section C26-604.4(b)
 of the Building Code. These doors must be selfclosing with a 3/4 hour fire protection rating;
- g) Glazing in corridors does not conform to requirements of Section C26-604.2(i). Existing glass is illegal as to type and size; and
- h) Exits from basement cafeteria, gymnasium,
 kitchen and boiler room are inadequate and unmarked.

 In general therefore, the means of egress in the structure do
 not in my opinion conform to the requirements of the Building

 Code of the City of New York. In the event of a fire the exit
 stairs would become a flue shaft for gases and smoke--an extremely
 hazardous condition.
- 5. Apart from deficiencies and illegalities in the matter of egress and safety, there are other physical inadequacies as follows:
 - a) The general appearance of the basement cafeteria and gymnasium is most deplorable, looking more like a dungeon in one of our more backward penal institutions. There is little or no natural light since the few available windows are glazed with obscure

glass. The artificial lighting is primitive, consisting of bare overhead bulbs;

- b) The mechanical ventilation system required

 by the Building Code for the basement—a public

 assembly space—appears to be inadequate;
- c) The boiler room, a hazardous space, is adjacent to the public assembly areas, and its door is illegal and should be a self-closing rated doc as per Section C26-704.2 of the Building Code;
- d) There are no toilets for the children on the basement or 1st floor--a condition which will not encourage sanitary practices by the children;
- e) The kitchen has a primitive gas range without a hood which is a hazardous condition;
- f) There is evidence of serious water leaks in the basement and elsewhere;
- g) Artificial lighting throughout the structure is grossly inadequate for modern educational needs:
- h) Many of the window frames are notted and require replacement or repair. There are also many broken windows;
- i) Wooden flooring in classrooms in some instances is warped severely making for a hazardous condition. In addition, the wood floors are not properly finished for proper maintenance and sanitation;

- j) The condition of the interior wells and ceilings show deficiencies and failures in the paint finish; and
- k) The exterior appearance of the structure is begrimed and forbidding, and should be cleaned thoroughly.
- 6. As mentioned above, my inspection has been limited; however, all of the aforementioned conditions are easily discernible to the trained eye.
- 7. It is a professional opinion that it would require an expenditure of at least one million dollars to restore this structure to a safe, useful and attractive educational facility and to make it amenable to modern educational needs and expectations.

Sworn to before me this

1st day of August , 1974.

NOTARY PUBLIC

KENNETH KIMERIING No. 31-7265745 stried in New York County

JULIAN NESKI, FAIA

Education:

Rensselaer Polytechnic Institute Bachelor of Architecture 1950

The New School

Registration:

New York New Jersey Massachusetts

National Council of Architectural

Registration Boards

Teaching:

Design Critic Pratt Institute 1957-59

Cooper Union 1966-68 Columbia

1973

Member:

Aper' an Institute of Architects

Ethics Committee

Honors:

College of Fellows, American Institute of Architects

BARBARA NESKI, AIA

Education:

bennington College Bachelor of Arts 1949

Harvard Graduate School of Lesign

Master of Architecture 1951

Member:

American Institute of Architects

Alumni Council, Harvard Graduate School of Design

Registration:

New York

Teaching:

City College of New York University 1974

ASSOCIATES

RONALD A. BECHTOL

Education:

Massachusetts Institute of Technology

Master of Architecture 1958

Registration:

New York Texas NCARB

SUSAN STROHBACH

Education:

University Stuttgart, Germany Master of Architecture 1962

Registration:

New York

AWARDS

A.I.A. Citation:	Exhibition on American Architecture sent to the USSR in 1958
A.I.A. Honorable Mention:	Homes for Better Living Award 1968 Hamilton Residence
A.I.A. First Honor Award:	Homes for Better Living Award 1969 Gorman Residence
Record Houses of 1968	Architectural Record Award of Excellence for House Design Hamilton Residence
Record Houses of 1969	Architectural Record Award of Excellence for Eouse Design Gorman Residence
Record Houses of 1971	Architectural Record Award of Excellence for House Design Sabel Residence
Record Houses of 1972	Excellence for House Design
Record Houses of 1977	Architectural Facerd Award of Excellence for House Design Simon Residence
A.I.A. Special Mention:	Peridential in ion Awardi 1971 Cates Posicino
A.I. Citation:	Pesidential lesign Awards 1972 Simon Residence

Jewish Museum 1960 EXHIBITS:

"Recent American Synagogue Architecture" Temple Emanu-El of west Essex

U.S. Plywood Show 1968

Chalif Residence

Expo Fair U.S. Pavilion Chalif Residence 1970 Japan

New York Times Magazine PUBLICITY:

Chalif, Neski, Kaplan and Simon Residence

Designs for Young Living by Barbara Plumb

Neski Residence

New York Times

Corman, Hamilton and Cates Residences, hoscow Exhibit

American Issue 1961

Life

Zodiac

Russell Residence

Time

Moscow Exhibit

Look

Chalif Residence

Art in America

Chalif Residence

A.I.A. Cournal

Chalif Residence

Architectural Forum

Professional Building, J.H.S.4. Chalif Residence, Pelham Parkwe Community Center

Architectural Record

German, Hamilton, Sabel, Kaplan and Simon Residences

Progressive Architecture

Felham Parkway Community Cente.

New York Hayarine

Chalif Pesidence

A.I.A. Guide to New York City

J.H.S. 43 and P.S. 306

A.I.A. Oculus

Lobby and Auditorium renovatio A.I.A. Headquarters

SELECTED BUILDINGS and PROJECTS

1957-64

"Cities USA" Exhibition sent to Moscow University USSR, Sponsored by the American Institute of Architects

Hollis Unitarian Church
Hollis, L.I., N.Y. (\$300,000.00)

Professional Office Building
New Brunswick, N.J. (\$175,000.00)

U.S. Pavilion
U.S. Exhibition in Moscow (\$750,000.00)

Plants and Offices Allan - Stevens Corporation Long Island City, N.Y. (\$350,000.00)

Templ Emanu-El Livingston, N.J. (\$350,000.00)

Community Center / Parish House (\$300,000.00) Church of St. Matthew and St. Timothy New York

Exhibition for Time Inc.
Time and Life Building, N.Y. (\$100,000.00)

Office Planning Readers Digest (\$300,000.00)

dunlor High School 43
Brooklyn, N.Y. (\$4,000,000.00)

Public School 506 Brooklyn, N.Y. (\$3,000,000.00)

Administration Building and Master Plan Old Bethpage Historic Village (\$1,800,000.00)

Seward Park Uiban Renewal Project

1964 to Present

Chalif Residence Easthampton, N.Y.	(\$ 100,000.00)
Hamilton Residence Stony Brook, N.Y.	(\$ 85,000.00)
Tanatex Chemical Corp., Offices and Lab Project Lyndhurst, N.J.	(\$ 500,000.00)
Gorman Residence Amaganset , K.Y.	(\$ 60,000.00)
Batten Residence Mill Neck, N.Y.	(\$ 600,000.00)
Tivoli Towers Apartments (Design Consu. Brooklyn, N.Y.	(\$6,500,000.00)
Law Offices London, Buttenweiser and New Y rk City	Chalif (\$ 150,000.00)
Kaplan Residence Easthampton, N.Y.	(\$ 100,000.00)
Cates Residence Barnes Landing, N.Y.	(\$ 100,000.00)
Sabel Residence Bridgehampton, N.Y.	(\$ 100,000.00)
Simon Residence Remsenburg, N.Y.	(\$ 90,000.00)
Frisch Residence Ashley Falls, Mass.	(\$ 100,000.00)
Pelham Parkway Community Center for NY Department	(\$2,500,000.00)
Freedom House / A.I.A. Headquarters Renovation	(\$ 100,000.00)

REFERENCES:

Clients

Mr. Henri Doll 18 East 7s Street New York, N.Y. 10021 %

212 249 4460

Dr. Leonard Hamilton Director of Menicine

Brookhaven Macienal Laboratory 510 VA4 6202

Mr Leonard Sussman Fragetive Director

Freedom House, Londell Willkin Memor, il

2 12 505 3344

Mr. William barton Chairman of the Loard

T.C. Frances 1301 Arrest M.C Americas New York, N.Y.

1.2 917 6636

Contractors

Mr. French Medicatte

Wm. Charlon builders inc.

476 Frith Are.

New York N.Y. 1917

112 683 3844

Order of Judge Weinstein, August 20, 1974

1 -01 M

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF : 74 CIV. 783
PUBLIC SCHOOL #19, et al., (J.B.W.)

Plaintiffs, : ORDER

Plaintiffs, :

COMMUNITY SCHOOL BOARD OF : COMMUNITY SCHOOL BOARD #14
OF THE CITY OF NEW YORK, et al., :

Defendants. :

This cause having come on for hearing on the motion of the plaintiffs for a preliminary injunction and the Court having considered the complaint and answer and affidavits submitted in support of said motion, and having heard oral evidence in open court, and having inspected various educational facilities in District #14, and the Court having made findings of fact and conclusions of law, it is

ORDERED, that the defendants, their agents, employees and attorneys and all persons in active concert or participation with them are hereb.

- (a) preliminarily enjoined from transferring any students who attend or will attend Public School 19K to Public School 122K;
- (b) to maintain children presently zoned to attend Public School 19K at that school except that the sixth grade shall attend Junior High School 50K;

- (c) to provide to plaintiffs remedial and compensatory education, including maximum feasible use of bilingual education. Defendants in consultation with plaintiffs, their counsel, appropriate agents of Brooklyn College and other educational specialists will prepare a plan for such compensatory and remedial education to be submitted to the Court, on 48 hours notice to plaintiffs' punsel, on September 16, 1974; ** As a part of such
- (d) -to allocate for such compensatory and remedial education, to the maximum extent feasible, monies which have been or will be received for the coming school year under federal, state and city programs for special education for disadvantaged children or children learning a second language, including but not limited to monies received under Title I, Title VII, New York State Urban Education and New York City tax-levy programs;
- (e) to use all their best efforts to procure additional funding from federal, state and city sources to provide for such compensatory and remedial programs have been hade;
- (f) to use their best efforts to expedite the construction of the Williamsburg Early Childhood Center so that construction shall be completed by and the building available for use no later than September, 1975; and
- (g) to use their best efforts to conflict the construction of Public School 380 so that construction shall be completed by and the building available for use no later than September, 1976.

IT IS FURTHER ORDERED that this preliminary injunction be and remain in full force and effect until final hearing of this cause and until further order of this Court and that other and different relief requested in the complaint herein is hereby reserved.

DATED: BROOKLYN, NEW YORK

augus > 0,19) 4

UNITED STATES DISTRICT JUDGE

Affidavit of Irving Anker

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL #19, et al.,

Plaintiffs,

-against-

74 Civ. 783 (J.B.W.)

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL BOARD #14 OF THE CITY OF NEW YORK, et al.,

Defendants

STATE OF NEW YORK)
COUNTY OF KINGS) ss.:

IRVING ANKER, being duly sworn, deposes and says:

- I am Chancellor of the City School District of the City of New York and am a named defendant in the within action.
- 2. I have been informed by the Corporation Counsel of the City of New York, my attorney in this action, that the Court has requested that I report to the Court as to the following:
- (i) Evaluation of the Plan submitted by CSB 14 for remedial and compensatory education at PS 19.
- (ii) Efforts of the Board of Education and/or the Chancellor that have or will be made to procure additional funding for alleviation of the problems incidental to split-session instruction at P.S. 19.
- (iii) A feasibility report as to the possible selection of PS 19 as a "pilot school" under the Aspira decree.
- 3. In accordance with the Court's request, I have reviewed the document submitted to this Court on behalf of Community School District 14 by Community Superintendent William A. Rogers entitled "Plan for Remedial and Compensatory Education for Students at P.S. 19."

- 4. In order to review the plan, I requested that three leading educators and administrators on my staff review the plan and submit comments and reactions to me. Their comments and my own review indicate the following:
- (i) As presented to the Court, the plan does not contain enough specific information as to the scope, design, and application of the programs mentioned in the plan to enable us to submit a meaningful review of the probable educational effectiveness of the plan.
- (11) The specialists who have reviewed the plan have indicated that the plan can be implemented through the reallocation by District 14 of funds already allocated to the District and the additional funds would not be necessary to put the plan into operation.
- 5. In my judgment, and in the judgment of the specialists who have reviewed the plan, it would be a disservice to the District which has developed this plan, for me to submit to this Court an essentially academic critique of the written plan since some of the criticisms which could be made concerning the plan as written may not in fact deal with the intent and actual design of the plan.
- 6. Under the decentralized school system of which I am Chancellor, it is the responsibility of the districts to design and operate programs of this nature. The role of the Chancellor and his staff is not that of direct supervision, but is more in the nature of insuring that all programs are operated in accordance with the policies of the city Board of Education and applicable laws and regulations while simultaneously giving such technical advice and assistance as may be requested or required by the District.

- 7. Because of the nature of the Chancellor's relationship to the District and the educational plan of the District, it would, in my judgment, be more appropriate for my staff to render such technical assistance to the District as would assist the District in formulating and developing a plan or plans which will provide meaningful assistance to the children involved.
- with any order or directives of this Court, in my view, the best assistance I can give to the District is to have specialists from the Division of Educational Planning and Support work with the District in strengthening the plan. This would include giving the District educational or administrative critiques of the plan, reviewing with the District the full details of the plan, and suggesting ways in which the plan could be revised if such revisions appear to be necessary.
- 9. Unless instructed to the contrary by this Court,
 I shall direct Dr. Edythe J. Gaines, the Executive Director of
 the Division of Educational Planning and Support to assign
 appropriate staff under her supervision to work with District 14 in
 reviewing and, if advisable, revising the plan so as to insure
 maximum educational effectiveness. Such review and assistance can be
 accomplished within a matter of several weeks or less.
- and compensatory education" for these students is the continuation of the present split-session at P.S. 19-K. The simplest and most direct bethod of improving the educational program of the students would include the elimination of the present split-session.

 Unfortunately, split-sessions are sometimes necessary because of over-utilization. In the case of P.S. 19, I believe that there are sufficient unutilized seats in the other schools of District 14 to

permit elimination of the split-session by a re-zoning of the school.

- 11. While the opening next year of an Early Childhood center adjacent to P.S. 19 would provide an immediate means for eliminating the split-session, the District can and should prepare for the elimination of the split-session through appropriate re-zoning of P.S. 19. Since the timely opening of the Early Childhood Center is dependent upon many construction factors which are not under the total control of the Board of Education, the District's re-zoning proposal will have to have a back-up alternative to be used in the event that the Early Childhood center is not available for use by the opening of school in the Fall, 1975.
- 12. The second question upon which the Court wishes information from me is the question of additional funding "for the alleviation of the problems incidental to split-session instruction at P.S. 19." Without in any way wishing to appear to be simplistic, the simplest method for alleviating the problems incidental to split-session instruction is to eliminate split-session instruction where this is feasible.
- 13. It is my belief that the most appropriate methods for dealing with the problems incidental to split-session instruction would be for this Court to permit the District to develop plans for militation of empty seats in other schools of the District and eliminate the present split-session at P.S. 19.
- 14. While such a rezoning should and would be done in consultation with parents who would be affected by the re-zoning, the responsibility for doing this rests with the District, subject to review by my staff for consistency with city Board of Education policies and applicable laws and regulations. Should such re-zoning be permitted, the District would be given full cooperation and techical assistance by our Central Zoning Unit.

- decentralization law (Article 52a of the New York Education Law)
 funds for operation of district instructional programs are allocated
 to each community district on the basis of an objective formula at the
 commencement of each school year. Within that allocation, each
 District has the right to allocate funds and teaching positions to
 its schools and programs. Thus, whether through reimbursable state
 or federal funds or through tax levy funds, the assignment of
 additional staff to P.S. 19 would be accomplished by the District
 through reallocation of its own resources.
- by the District to this Court would appear to be capable of implementation by District through reallocation of its existing funds.
- P.S. 19 as a "pilot school" under the provisions of the consent decree in Aspira of New York, Inc., et al. v. Board of Education, et al., 72 Civ. 4002 (S.D.N.Y., Frankel, D.J.), it must be understood that under the terms of that decree, pilot schools were designated based upon competitive applications submitted by the community districts.
- was arranged which was attended by my counsel, a representative of the Corporation Counsel's office, the special assistant on my staff in charge of implementation of the consent decree, the Director of the Office of Bilingual Education, and Community Superintendent Rogers and his assistant at which the feasibility of having the District apply for designation of P.S. 19 as a pilot school was discussed.
- Mr. Rogers that all possible consideration would be given to designating P.S. 19 as a pilot school <u>if</u> District 14 chose to submit an application. My staff informed Mr. Rogers that subject

only to the deadline for the designation of pilot schools imposed by the consent decree itself, the deadline for filing proposals would be extended if the District decided to submit a proposal for P.S. 19, due to its relationship to this court action.

20. On infermation and belief, at that meeting, Mr. Rogers was advised by the Director of the Office of Bilingual Education that the high utilization of P.S. 19 and the split-session at the school would be factors which would make it difficult for a feasible and effective plan to be drawn up by the District. However, Mr. Rogers was requested by our staff to discuss the matter with his Community School Board to determine whether in spite of this the District wished to submit a proposal to have P.S. 10 be designated as a pilot school.

21. The District submitted a proposal for a different school and that proposal was approved and the school was designated as a pilot school.

Irving Anker

Sworn to before me this

22nd day of November, 1974

Notary Public M. CC.

Notary Public

Nofory Public State of Now York
No. 24 4015279

Qualified in Kings County Commission Explose Murch 30, 1975

Motion for Leave to File Supplemental Complaint and Serve Supplemental Summons

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL #19, et al.,

Plaintiffs,

-against-

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT #14 OF THE CITY OF NEW YORK, et al.,

Defendants.

MOTION FOR LEAVE TO FILE SUPPLEMENTAL COMPLAINT AND SERVE SUPPLEMENTAL SUMMONS

74-C-783 JBW

Upon the affidavit of Patricia Vergata, counsel for plaintiffs, and the supplemental complaint submitted herewith plaintiffs will move this Court in Room 10, United States Courthouse, Cadman Plaza, Brooklyn, New York on December 62, 1974 at 9:30 A.M. for an order pursuant to Rule 15(d) of the Federal Rules of Civil Procedure granting leave to file a supplemental complaint and to serve a supplemental summons on Terrell H. Dell, Commissioner of the United States Office of Education, on the grounds that transactions, occurrences and events stated in the supplemental complaint have happened since the date of plaintiffs original complaint and that it is in the interest of justice that all issues between plaintiffs and defendants be litigated in this action.

BROOKLYN, NEW YORK DATED. NOVEMBER 2/, 1974

> RYCHARD S. PANEBIANCO IRA S. BEZOZA, OF COUNSEL

PATRICIA VERGATA

WILLIAMSBURG NEIGHBORHOOD LEGAL SERVICES

260 BROADWAY

BROOKLYN, NEW YORK 11211 212-782-6195

2 Lix

KENNETH KIMERLING
HERBERT TLITELBAUM
PUERTO RICAN LEGAL DEFENSE
& EDUCATION FUND, INC.
815 SECOND AVENUE
NEW YORK, NEW YORK 10017
212-687-6644

ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT E. TERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL #19, et al.,

Plaintiffs,

-against-

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT #14 OF THE CITY OF NEW YORK, et al.,

Defendants.

AFFIDAVIT IN SUPPORT OF MOTION FOR LEAVE TO FILE SUPPLEMENTAL COMPLAINT AND ISSUE SUPPLEMENTAL SUMMONS

74-C-783 JBW

STATE OF NEW YORK)
: ss.:
COUNTY OF KINGS)

PATRICIA VERGATA, being duly sworn, depose and says:

- 1. I am one of the attorneys representing the plaintiffs in this action and fully familiar with the proceedings had heretofore. I make this affidavit in support of the motion for leave to file a supplemental complaint and to serve a supplemental summons on Terrell H. Pell, Commissioner of the United States Office of Education of the Department of Health, Education and Welfare.
- 2. On or about June 26, 1974, after the institution of this action, the United States Office of Education approved a grant of \$467,231 to Community School Board No. 14 to provide a bilingual education program under Title VII of the Elementary and Secondary Education Act, 20 U.S.C. 880b et seq., known as the Bilingual Education Act. Under Title VII federal funds are provided to local educational agencies to develop new and imaginative bilingual programs designed to neet the special educational needs of children of limited English-speaking ability.

- This grant is a revision of the original application Board of defendant Community School/No. 14, the local educational agency which had been submitted in two parts to the Office of Education in February, 1974. The first part requested \$313,231 for a Spanish-English program to provide services to 695 pre-kindergarten through fourth grade children. The second part requested \$658,479 for a Yiddish-English program to provide services to 760 pre-kindergarten through first grade children. The application for the Spanish-English program was for the fifth year of a five year program (Title VII funding for a specific program is normally only available for five years, 45 C.F.R. \$ 123.14(b), 39 Fed. Reg. 17968, May 22, 1974), and was to service 328 students at P.S. 122, 67 students at Saints Peter and Paul School and 300 students at Our Savior School. Saints Peter and Paul and Our Savior are two non-profit private schools of the Catholic faith located with. Community School District No. 14. The second part of the application submitted by defendant Community School Board was a first year proposal designed to service 400 students at Beth Rachel School for Girl and 360 students at United Talmudical Academy, two non-profit private schools of the Jewish Hasidic faith located within Community School District No. 14.
- 4. On information and belief, during the month of June 1974, Mr. Norman Spiegel and Mr. Jeffrey Feingold, two members of the Community School District No. 14 staff responsible for the Title VII program administration, held meetings with the United States Office of Education in Washington, D. C. which resulted in the modified grant approval of \$467,231 to service 348 public school children and 768 parochial school children: 69 in Saints Peter and Paul, 299 in Our Savior, 300 in Beth Rachel School for Girls and 100 in United Talmudical Academy.

- 5. On or about July 24, 1974, the defendant Community
 School Board held their monthly public meeting. On the agenda
 was a resolution approving the Title VII proposal to be voted
 upon by defendant members of the Community School Board. The
 Chairman of the Community School Board, Brother Lally, ruled any
 discussion and questions on the substance of the programs servicing parcchial school children out of order. Thereafter, the
 members of the School Board voted but failed to pass the resolution.
- 6. On September 6, 1974, a special public meeting was convened by the Community School Board to consider solely the Title VII resolution. The meeting lasted approximately ten minutes at which the resolution received unanimous approval by the Board members.
- 7. In October, 1974, Community School District No. 14 filed a schedule of personnel assignments in the Title VII program with the Board of Education, indicating the number of personnel servicing public and parochial schools. A copy of this schedule is annexed to the Supplemental Complaint (Exhibit 2), submitted herewith. More personnel are assigned to serve parochial school sites than the public school site.
- 8. It is plaintiffs' contention in the supplemental complaint submitted herewith that the provision of bilingual education services to a disproportionately greater extent to children enrolled in parochial schools in District No. 14 than the children enrolled in public schools violates Title VII and the regulations promulgated thereunder and the First Amendment to the United States Constitution.

9. Additionally, pursuant to the federal regulations (45 C.F.R. § 123.16, 39 Fed. Reg. 17968, May 22, 1974) a single Com-

munity Advisory Committee, at least 50% of the members of which

must be parents of children directly affected by the entire pro-

gram, must be established and must hold monthly public meetings.

No such Committee has been established or has held such meetings.

10. On August 20, 1974, this Court ordered the defendants

to provide to plaintiffs a program, with maximum feasible use of

bilingual education, to compensate for lost educational time. On

October 10, 1974, the Court ordered that the defendants make

further efforts to seek funding to provide such a program. Thus,

the funding for a bilingual education program is the keystone of

the relief sought by plaintiffs. Since plaintiffs are now con-

tending that the defendants have illegally allocated funds for

bilingual education programs, which funds, if properly allocated,

could form a basis for plaintiffs' relief, in the interests of

judicial economy it is sound discretion to grant plaintiffs'

motion and have the entire controversy litigated in the same

action.

PATRICIA VERGATA

Sworn to before me this

21st day of November, 1974.

() 1

NOTABY PUBLIC

RICHARD S. PANEBIANCO NOTARY PUBLIC, STATE OF NEW YORK NO. 24-300000

Commission Expires March 30, 1977)

Affidavit of Norman Spiegel

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

JA 124

PARENTS' COMMITTEE OF PUBLIC SCHOOL #19, et al.,

Plaintiffs,

-against-

AFFIDAVIT

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL BOARD #14 OF THE CITY OF NEW YORK, et al.,

lefendants.

STATE OF NEW YORK)
: SS.:
COUNTY OF NEW YORK)

NORMAN SPIECEL, being duly sworn, deposes and says:

- 1. I am the Director of the Re-imbursable Programs for Community School District No. 14 and submit this affidavit in opposition to plaintiffs' motion for leave to serve a supplemental summons and file a supplemental complaint.
- 2. My duties as Director of Pe-imbursable Programs include the preparation and filing of grant applications for re-imbursable funds under Title VII of the Elementary and Secondary Education Act (E.S.E.A.), 20 U.S.C. 880b et. seq.
- 3. Commencing with the school year 1970-71 District 14 received a grant from the United States Office of Education (H.E.W.) for a five-year project under Title VII In that year, the District received \$150,000 for instructional services, materials and supplies, administrative services and staff development services as set forth in Exhibit "A" annexed hereto.
- 4. This project was designed to establish and develop an experimental early childhood instructional program utilizing a bilingual, bicultural approach to assure the more effective participation of non-English dominant children in the educational process. In view of the large numbers of Spanish-speaking children in the District, the project was

directed predominantly at that target population.

- 5. For the second year (1971-72), this grant provided \$152,974 for instructional services, materials and supplies, administrative services and staff development services as set forth in Exhibit "B" annexed hereto.
- 6. For the third year (1972-73) this grant provided \$154,323 (including a carryover of 4,323 from the and prior year) for instructional services, materials/supplies, administrative services and the staff development services as set forth in Exhibit "C" annexed hereto.
- 7. For the fourth year (1973-74) this grant provided \$145,000 (including a carryover of 16,235 from the prior year) for instructional services, materials and supplies, administrative services and staff development services as set forth in Exhibit "D" annexed hereto.
- 8. Thus, for the previous four years (see Exhibits A-D) the Title VII grant has been utilized solely to provide services for Spanish-dominant English-language handicapped children in the District. Predominantly, these funds totalling approximately \$582,000 were allocated for the Bilingual Early Childhood Center located in PS 122 in District 14. No instructional services for children in non-public schools were provided. A minimal allocation was made for staff development services.
- 9. In the fifth and final year of this continuing five year project under Title VII (1974-75) District 14 submitted an application for funds which for the first time made provision for the allocation of instructional services to children in non-pu'lic schools in the district.

- 10. This application was submitted in two parts, to wit, a Spanish-English component for P.S. 122, Sts. Peter and Paul, and Our Savior; and a Yiddish-English component for United Talmudical Academy and Beth Rachel.
- approved by the United States Office of Education (HEN) on June 26, 1974 in the amount of \$486,231 (including a carry-over of \$19,000 from the previous year). The subject grant application is a continuation of a five-year project under Title VII which expires June 30, 1975. The breakdown of services procured under this funding is set forth in the Title VII application materials submitted to Court as per its order filed October 23, 1974.
- intended to provide for financial assistance to local educational agencies for exemplary pilot or demonstration projects in bilingual and bicultural education in a wide variety of settings. These projects should stimulate and encourage the development and operation of new and imaginative programs which meet the special needs and potential of the target group. "New and imaginative" means programs which either have not existed previously for persons of the target group or are to be substantially increased, improved or extended.
- 13. Within this conceptual framework, the District compiled statistics describing the incidence of English language-handicapped children throughout the district.
- 14. In the Public Schools, the District employed the Language Data Survey which had been utilized by the Board of Education for such purposes. As of October 31, 1973, the survey revealed that of the 26,654 children tested, 5161

500-

for less

.

children were classified as Category I (moderately language handicapped) and 2498 children were classified Category II (severely language handicapped) in District 14. Annexed hereto as Exhibit E is a copy of said Language Data Survey.

the non-public schools in District 14. Powever, a language data survey utilizing similar techniques which was used in non-public schools for classification of language handicapped children, revealed that of 11,095 children enrolled at the Hebrew Day Schools and included in the survey, 7,890 children were Yiddish-dominant. A copy of this survey a annexed hereto as Exhibit "F".

the other parochial schools in District 14 revealed that of 6911 children surveyed, 2491 were Spanish-dominant English-language handicapped. Annexed hereto as Exhibit "G" is the survey of the Catholic parochial schools.

17. As provided in 20 YSC §880b-3b(3)B:

(B) that, to the extent consistent with the number of children enrolled in nonprofit private schools in the area to be served whose educational needs are of the type which this program is intended to meet, provision has been made for participation of such children;

SEA

children were classified as Category I (moderately language handicapped) and 2498 children were classified Category II (severely language handicapped) in District 14. Annexed hereto as Exhibit E is a copy of said Language Data Survey.

- the non-public schools in District 14. However, a language data survey utilizing similar techniques which was used in non-public schools for classification of language handicapped children, revealed that of 11,095 children enrolled at the Hebrew Day Schools and included in the survey, 7,890 children were Yiddish-dominant. A copy of this survey is annexed hereto as Exhibit "F".
- 16. A similar language data survey conducted in the other parochial schools in District 14 revealed that of 6911 children surveyed, 2491 were Spanish-dominant English-language handicapped. Annexed hereto as Exhibit "G" is the survey of the Catholic parochial schools.
 - 17. As provided in 20 YSC §880b-3b(3)B:
 - (B) that, to the extent consistent with the number of children enrolled in nonprofit private schools in the area to be served whose educational needs are of the type which this program is intended to meet, provision has been made for participation of such children;

- designed to benefit children and not schools and to insure that certain children would not be discriminated against merely because they attend a private parcellial school.
- 19. To effect this purpose the local public educational agency has wide latitude in fashioning programs of direct benefit and advantage to elementary and secondary school pupils regardless of whether or not they are enrolled in public schools.
- 20. This provision of the E.S.E.A. has enabled District 14 to develop, improve and extend a Model Early Childhood Bi-Lingual Program at P.S. 122 which is completing its fifth and final year.
- 21. Moreover, the District has been able to develop a new and imaginative program for children in the non-public schools indicated above which previously did not exist. In fact, the Yiddish-English component of the District's Title VII project is the first of its kind in this country.
- 22. Moreover, the participation of the parochial schools in the Title VII program has been the impetus for legislatively favored dialogue between the officials of the District and the representatives of the non-public schools.
- 23. Since September 1974, the District has been delivering services in accordance with the allocations approved by the Office of Education (H.E.W.) under the current Title VII grant.
- 24. If the Court were to grant the plaintiffs' motion not only would this impede the developing dialogue with the non-public schools, but, occuring mid-year, it would seriously disrupt the education of children in the affected schools.

1

1

25. This is particularly disturbing in light of the fact that since February, 1974, plaintiffs have been aware of the schools targetted for participation in this year's Title VII grant and have at no time prior hereto contested the provisions of that grant. Consequently, the District, and, more importantly, the children being serviced by the Title VII grant will be prejudiced by plaintiff's dilatory attack herein.

grant was submitted to and approved by the Office of Education (N.E.W.) upon the prior participation and advice of the parents of the affected children.

A parent advisory committee was established to represent the Spanish-dominant children in the project. This "Bi-lingual Program Parents Consultation Committee" represented the parents of affected children at P.S. 122, Sts. Peter and Paul, and Our Savior.

Similarly a parent advisory committee was established to represent the Yiddish-dominant children in the project.

27. I have been advised by the Office of Education (II.E.W.) that the two parents advisory committees should be consolidated into a single parents advisory committee for bi-lingual programs under Title VII. In this regard I am endeavoring to organize such a unified committee.

28. In conclusion, during the first four years of this five year project approximately \$582,000 in Title VII funds have been allocated for the eligible children in the public schools. For the same period, virtually no funds were allocated for eligible children in non-public schools.

In the fifth and final year of this five year project, the P.S. 122 project will be receiving an allocation of \$150,000. Approximately \$330,000 is allocated for

children in the non-public schools for the current school year.

Thus, for the five year duration of this project approximately \$732,000 has been allocated for service to eligible children in the public schools of the district whereas approximately \$350,000 has been allocated for eligible children in the non-public schools of the district.

- 29. Plaintiffs' assertion that the non-public school children are receiving a disproportionate allocation of Title VII services is manifestly without merit particularly in view of the comparative number of eligible Title VII children in the public and the non-public schools.

 (See Exhibits E, F and G).
- and effort in consultation with parents advisory groups, the New York City Board of Education, the New York State Office of Education and the Office of Education (H.E.W.) in designing and implementing the current Title IVII project. The Court should refrain from substituting its judgment for that of the educational experts and should reject plaintiffs' ill-considered attempt to, in effect, pit two needy groups of children against each other for limited federal funds.

NORMAN SPIEGEL

Sworn to before me this day of December, 1974.

INITIAL PLAN FOR THE IMPELEMENTATION OF A /*
BILINGUAL EDUCATION PROGRAM

Under the Provisions of Title VII, ESEA

Title: BILINGUAL PRE-SCHOOL LEARNING CENTER

Submitted by: District 14, Brooklyn

223 Graham Avenue Brooklyn, New York 11206

Mr. Ralph T. Brande, Superintendent - Mr. Daniel Portelles, Submitted to: Division of Plans and Supplementary Centers Project Director

Bureau of Elementary and Secondary Education

U. S. Office of Education 400 Maryland Avenue, S. W. Washington, D. C. 20202

Date Transmitted: June 10 1970
Month Day Year

*Indicate the purpose for submitting this application: Initial Plan for the Implementation of a Bilingual Education Program; or Application for Continuation

DEPARTMENT OF FEMALT., EDUCATION, AND WELFARE
OFFICE OF EDUCATION
WASHINGTON, D.C. 20202

PROGRAMS UNDER BILLINGUAL EDUCATION ACT (TITLE VII, ESEA)

APPLICATION

PART I - GENERAL INFORMATION

	OE Assigned Project Number 420330
ECTION APROJECT INFORMATION Prelim. Prop. Init. Pl	this form: (Chack One) Year 5
PROJECT TITLE: BILINGUAL PRE-SCHOOL LEARNING CE	IN TER :
PROJECT SUMMARY: (For Initial Plan Only) (See Attache	d Sileet)
SUBMITTED BY: District 14, Williamsburgh-Gree (Name of Local Educations	annoint, Brooklyn, N.Y.
223 Graham Avenue (Street Address)	. 1
Brooklyn, New York 11206	
(City State	Zip Code)
212 - FV- 7-2018	ode and Sucher
(011100 1010)	Code and Number)
. Name of Superintendent: Mr. Ralph T	
CONGRESSIONAL DISTRICT(S) 14 COUN	VTY (IES) KINGS
JOINT APPLICANT:	
(Street Address)	
(Office Telephone Area Co	ode and Number)
(Signature of Authori	ized Representative)
NAME OF PROJECT DIRECTOR: Mr. Daniel N. Portelles	
223 Graham Avenue Brooklyn, Nev	w York 11206
(Street Accress)	(City State Zip Code)
certify that the information contained in this applica- rrect and the local educational agency named above, has	ition. is, to the best of my knowledge
file this application.	Date Submitted
Enature of Person Authorized to Receive Grant	, / /
· 162-165-	6/11/70
(/	

SECTION A - Project Summary

The District 14 Bilingual Pre-School Learning Center will serve as an Early Childhood Bilingual Demonstration Center within the Williamsburg-Greenpoint section of Brooklyn, an area with a school population of 29,000 children where almost 65% are of Spanish-speaking background.

The major emphasis of the Bilingual Pre-School program will be in developing skills in the dominant and second language through carefully planned activities which can be measured in terms of behaviors.

The Direct Instructional System for Teaching Readiness and Language will be the program called DISTAR. Distar will form the base care for the structured lessons of language in Pre-K and Language and Readiness in Kindergarten. The Distar program will utilize both Spanish and English as mediums of instruction. The children will be taught two lessons daily; one in their dominant language and the same lesson in their second language.

The periods of work/play, music, literature, physical activities, cultural, enrichment, etc., will allow for the normal
flow: of communication in a mixed small group setting. Blocks,
teleplay, theater, doll corner, and an array of multisensory games and
activities will facilite the use of both languages. The teacher
and paraprofessional will utilize this period of activities to
reinforce vocabulary and concept development in the childs dominant
and second language; and will maintain a small group instructional
setting.

A Family Worker and a Family Assistant who are bilingual will provide special services to parents both in and out of school. During school hours they will meet with parents in the Family Room to discuss the bilingual program and to assist parents with their problems and offer possible solutions.

Public School 122 will house the Pre-School Learning Center for both the Bilingual and non-Bilingual components. Of the schools 340 Pre-Kindergarten and Kindergarten students, 30 Pre-K Continued: JA 135

and 50k children will participate in the Bilingual Demonstration Project. Of these children 65% will be chosen because of their dominance in the Spanish Language and 35% will be chosen because of their dominance in the English Language. This dominance will be determined through questioning the child's parents at registration and an oral interview with the child conducted by a team of bilingual parents and teachers. (Bilingual Program Committee of District 14).

TYPOL C - TOTAL PROJECT PARTICIPANTS	(See Instr	uction	s on Pag	e 110)			
Student Population Dara		Pre-	! K	1	2	3	Other Elemen.	Second
Total ADM's of LEAR'S for preceding school year	Public (1) . School	740	31.00					
XX	Roupublic (2) School	0	.0	·				
dominant language is not English	Public (1) School	565	1835					
Continue Tangoogo To	Conpublic (2) School	0_	0		1.			
. / ?! of project area for preceding		60	1 200		_	-		
sencol year	Monpublic (2)	0	0.		<u> </u>			
. Enber of children in project	Public (1)	48	160					
erea whore downant language is	Nonpublic (2)	0	10					-
. Hamber of children in project	Public (1)	20	32			! -		
not English who would partici-	Nonpublic (2)	0	0			-		-
. Husber of children in project area whose dominant language is	Public (1)	_10	1 18	· _		<u> </u>		
English who wild participate	Nonpublic (2)	0	10			<u> </u>		ļ
Total number of children in	Publiqe(1) + f(1))	30_	50			1		-
project area who would partici-	Nonpub. (c(2) / f(2))		1			_!		!
para in project (Add e and f)	Total (g(1) + g(2))	30	50		1			

And: The aggregate of the daily membership for the school year divided by actual days school was in sessi

Y Non-public schools will not participate during the first year since there aren't an components in the project area. However, Non-public school teachers will protect training program.

SECTION	. Addie	ional Proje	ct Data (See ins	tructions of	n page 11	1)	* *	
. 2.	MUGIC	Total Proje	birti (See Ins	eracerons o	thase II			. '
			t participation					
	b. S	taff engage	d in inservice t	raining		Number	r 6	
•	c. A	dults				Number	760	XX
			of project part a. Total student				100	April 1 April
			guage is not Eng					
	1	ow-income f	amilies		 .	Perce		
	f. P	rojected pe	r-pupil cost					75/5
	g. E		rcentage of targ					•
		Rural (f	ewer than 2500 i	andaltants)		Perce	nt 1	00
	h. F	stimated no	2500 or more inh	dren from m	migrant	tetce		•
•	f	amilies				Perce	nt _	0
				·			SPA	MISH
	i. D	ominant Lan	guage(s) other t	man English			OI I	IN J.SII
	i. D							:
	i. D		iguage(s) other this indicate the state of t		lian will	partic	cipate	in t
	i. p	Each ch	ild's parent	or guard	lian will	pro.	cipate	in t
SECTI	i. p	Each ch	ild's parent		lian will	pro.	cipate	in t
	i. D xx	Each ch	ild's parent	or guard	ian will	pro-	cipate ject)	in t
	i. D xx	PARTICIPATI	ild's parent	or guard	ian will	pro-	cipate ject)	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools	or guard	ions on pag	pro-	cipate ject) (on (Num	in t
	i. D XX ON D - of Part	PARTICIPATI	Location of Schools 58 Harrison	or guard e instructi Grade Level(s) Pre-K	ions on pag	pro-	cipate ject) lon (Munis per C	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools 68 Harrison Avenue	or guard e instructi Grade Level(s) Pre-K K	ian will	pro-	cipate ject) (on (Num	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools 58 Harrison	or guard e instructi Grade Level(s) Pre-K K	ions on pag	pro-	cipate ject) lon (Munis per C	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools 68 Harrison Avenue	or guard e instructi Grade Level(s) Pre-K K	ions on pag	pro-	cipate ject) lon (Munis per C	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools 68 Harrison Avenue	or guard e instructi Grade Level(s) Pre-K K	ions on pag	pro-	cipate ject) lon (Munis per C	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools 68 Harrison Avenue	or guard e instructi Grade Level(s) Pre-K K	ions on pag	pro-	cipate ject) lon (Munis per C	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools 68 Harrison Avenue	or guard e instructi Grade Level(s) Pre-K K	ions on pag	pro-	cipate ject) lon (Munis per C	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools 68 Harrison Avenue	or guard e instructi Grade Level(s) Pre-K K	ions on pag	pro-	cipate ject) lon (Munis per C	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools 68 Harrison Avenue	or guard e instructi Grade Level(s) Pre-K K	ions on pag	pro-	cipate ject) lon (Munis per C	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools 68 Harrison Avenue	or guard e instructi Grade Level(s) Pre-K K	ions on pag	pro-	cipate ject) lon (Munis per C	in t
	XX ON D - of Part School	PARTICIPATI	Location of Schools 68 Harrison Avenue	or guard e instructi Grade Level(s) Pre-K K	ions on pag	pro-	cipate ject) lon (Munis per C	in t

TOTAL

Total

r ----- and

on

BOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSINESS AFFAIRS BUREAU OF REIMBURSABLE PROGRAMS PROJECT BUDGET 1971-1972

JA 138

rogram Bilingual Early Childhood Center District # 14

(125:05) Duration of Program: July 1, 1971 - June 30, 1972 6/18/71

0,10,71		AMOUNT OF	PROJECT
Summer Component	NUMBER	TIME	COST
Assistant Coordinator (L307) 1x2 hrs. x 29 days=	:	•	
38 hrs. x \$ 12.91 per hr.	1		\$ 749
Peachers (L392) 3x3 hrs. per day x 29 days = 261 hrs. x \$ 10.75 per hr.	3 .		2,806
rainee Professional (L916) x2 hrs. x 29 days = 8 hrs. x \$ 3 per hr.	1	•	174
ducational Asst (L904) x3 hrs. x 29 days = 48 hrs. x \$ 3.15 per hr.	4.	•	1,097
cation 5% x 348 hrs. = 8 hrs. x \$ 3.15 per hr.			57
cachers Aides (L910) x5x24 day=120 hrs. x5x29 day=145 hrs.	3		
x3x29 days=87 hr.)352 hrs. x \$ 2.80 per hr.		•	986
3cation 5% x 352 hrs. = 8 hr x \$ 2.80 per hr.			51
mil ssistant (L905) x3xi ays=174 hrs. \$ 3 por hr.	2		۳.۰
cat' 5% x 174 hrs. =			549
hrs \$ 3.15. per hr.			29
air on Professional (L912) 1 1 29 days = 13 h x \$ 2 per hr.			1.04
fice opplies (C11/1)			406
sph s Service (C439)			75
oby 4 201.4100 (0424)			54

BOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSINESS AFFAIRS BUREAU OF REIMBURSABLE PROGRAMS PROJECT BUDGET 1971-1972

JA 139

name of the state	strict # 1	h		
Program Bilingual Early Childhood Center Dis Duration of Program: July 1, 1971 -	- June 30,	1972 (1	2 months)	1
6/18/71				СТ
Summer Component	NUMBER	AMOUNT TIME	COS	
Summer Components				
Consultants (C412) 4 days x \$ 100 per day				400
Trips Bus - (C421)				300
Audio - Visual Supplies (C111)				1.50
Classroom Supplies (C113)				150
Parent Involvement Fund (C499)				150
The state of the s				
SCHOOL YEAR SEPT - JUNE				
Director (L151)	1	6/12	22,795	11,397
3x \$ 10,500	·3	10mos	10,500	31,500
Toacher (Curr-Developer) (L392) 70 hours x \$ 11.68 per hr.	•			81,3
Educational Ass't (L904) 7x6 hrs. x 211 days = 8862 hrs. x \$ 3.45 per hr.		•		30,574
Fami Ass't (L905) 1x6 x 211 dys = 126t 's. x \$ 3.45 per hr.				4,368
Sr. 9 ist (L619)	1	12/12	6,000	6,000
Educ onal Research (C411) Tys For Learning Inc, Morin Assoc. N ork Language Center				13,000
Cone it (Cl ₁ 12) 1 da . \$ 100 per day 3 da: x \$ 100 per day				400
Puitt (C494) 1 Y k University - School Of Cont. Educ. 1 Po a Professionals x \$ 675 x 2 Semesters				10,800
Tow Cuniversity - School Of Education rs x 12 Credits x \$ 83 per Credit				7.968

BOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSINESS AFFAIRS BURBAU OF REIMBURSABLE PROGRAMS PROJECT BUDGET 1971-1972

JA, 140

Program pilitaria Paris Childhead Canton Di	atrict # 4	M		
Program Bilingual Early Childhood Center Dis Duration of Program: July 1, 1971 To	Juno 30,	1972 (12	months)	
1/18/71		AMOUNT OF		
SCHOOL YEAR SEPT - JUNE	NUMBER	TIME	COST	
Above Basks (CA 24)			A	325
Library Books (C131)			\$	
Textbooks (C129)			-	200
Classroom Supplies (C113)			- 1	1,000
Office Supplies (C141)				600
Audio Visual Supplies (C111)				500
Travel (C405) To Tesol Convention Texas Dir + 2 Trs. 3 days plus Airfare + Local Expenses			1	1,200
Mileage For Director + Teachers 12 per (C421)			300
rfar; For Para Professional (C421)				400
Parent Involvement Fund (C199)	•			650
Parent Snacks (C495)			•	200
Equipment (C399) 4 Sewing Machines x \$ 50 Each				200
Vide - Tape Recorder + Camera Comp. (C322)				3,000
Pos+ , (C427)				200
Teleone Service (C439)				250
Prin g Services (C441)				50
Tri C779) Bus 9s				1,420
	•			246
Soci Security - (0740) \$ 34 x 5.2%				1,817
11+ (C707) 9x \$ 240				2,160

BOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSINESS AFFAIRS BUREAU OF REIMBURSABLE PROGRAMS PROJECT BUDGET 1971-1972

JA: 141

rogram Bilingual Early Childhood Contor Di	strict #	114	
Duration of Program: July 1, 1971 T	o June 30	, 1972 (12 r	months)
6/18/71 CHOOL YEAR SEPT - JUNE	NUMBER	AMOUNT OF	PROJECT COST
ocial Security (C740) (x9,000) (x4,500) \$ 31,500x5.2%			\$ 1,638
tirement (C614) 42,897 x 10.14%			4,350
.oalth (0707) 2x240 3x \$ 240			840
olfaro (C743) x270 1x175 3x \$ 270			1,120
upervising Stenographer (L811) 50 hrs. x \$ 4 per hr. TOTAL COST OF PROGRAM			1,800 \$ <u>152,974</u>

100% Reimbursable
PL 89 - 10 As Amended - Title VII
Federal Funded

44 N. C.

BOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSINESS AFFAIRS BUREAU OF REIMBURSABLE PROGRAMS PROJECT BUDGET 1971-1972

JA 142

ProgramBilingual Early Childhood Center District # 14

· Duration of Program: July 1, 1971 To June 30,1972 (12months)

8/2/71	
--------	--

8/2/11					
	BUDGET MODIFICA	FROM # 1	<u>TO</u>	CHAN	GE
Trainge Professional (L9	916)			• • • •	(
1x2 hrs. x 29 days=58 hr	rs.x \$ 3 per hr.	\$ 174	-0-	\$.174
3x1 hrs. x 29 days=87 hr	rs.x \$ 3 per hr.	-0-	+ \$ 261	. + \$	261
Trainec Non-Professional	(L912)			:	
2x4 hrs. x 29 days=232 h	hrs. x \$ 2 per hr.	-0-	+ 464	+	464
Classroom Supplies (C11	3)	4,000	3,449	-0.	551
				C	

NO CHANGE IN MONEY

BOARD OF EDUCATION OF THE CITY OF NEW YORK
OFFICE OF BUSINESS AFFAIRS
BUREAU OF REIMBURSABLE PROGRAMS
PROJECT BUDGET 1971-1972

JA 143.

Program Bilingual Early Childhood Center -- District 14

Duration of Program: July 1, 1971 to June 30, 1972

9/30/71			
BUDGET MC	DDIFICATION # 2 FROM	TO	CHANGE
Teacher Aides (L910) 1 x 6 hrs. per day x 211 days = 5064 hrs. x \$3.00 per hr.	-0-	\$15,192	+\$15,192
Educational Assistants (L904) Decrease from 7 to 4)	\$30,574	17,471	- 13,103
Social Security (C740)	1,817	1,926	+ 109
Health (C707)	2,160	2,400	+ 240
Custodial Costs (C456)	-0-	, 250	+ 250
fuition (C494) (Para-Professionals)	10,800	9,450	- 1,350
Supervising Steno (L811)	1,800	-0-	- 1,800
Text ooks (C129)	200	362 .	+ 162
Tel one (C439)	250	550	+ 300

No Change in Money

BOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSINESS AFFAIRS BUREAU OF REIMBURSABLE PROGRAMS PROJECT BUDGET 1971-1972

JA 144

	Bilingual	Early	Childhood	Center	Dist.	#	14
Drogram	DITTILLAND			-	-	Designation	-

Duration o	f Program:	July 1, 1971 - June 30, 1972	
			PROJECT
10/12/72			 COST

BUDGET MODIFICATION # 3

	FROM	TO	CHANGE
CONSULTANTS (c412)	500	-0-	-\$500
5 Days x \$100. per day VIDEO-TAPE REORDER (c322)	3000	2500	- 500
TUITION (c494)	9450	8450	-1000
CLASSROOM SUPPLIES (cll3)	3449	5449	+2000

NO CHANGE IN MONEY

BOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSINESS AFFAIRS BUREAU OF REINBURSABLE PROGRAMS PROJECT BUDGET 1971-1972

JA 145

ogram Bilingual Early Childhood Center - District #14	· · · · · · · · · · · · · · · · · · ·	
Duration of Program: July 1, 1971 to June 30, 1972		
11/8/71		
BUDGET MODIFICATION # 4 FROM Educational Research (C411) \$13,000 -	<u>TO</u> \$12,000 1,400	- \$1,000 + 1,000
Consultants (C412) 20 days x \$50 per day Equipment (C399)	200	-0-
Sewing Machines \$50	\$100	-0-

No Change In Money

BOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSINESS AFFAIRS BUREAU OF REIMBURSABLE PROGRAMS PROJECT BUDGET 1971-1972

. JA 146

od Conter - District	#14		
1971 - June 30, 1972			
DIFICATION # 5			
· FROM	TO	2	CHANGE
	\$1,125	+ \$1	,125
\$1,638	1 . 950	+	312 _{,00}
7,968	7,470	-	498
11,397	10,565	-	832
5,449	5,342	-	107
	1971 - June 30, 1972 DIFICATION # 5 FROM0- \$1,638 7,968 11,397	FROM TO \$1,125 \$1,638 1.950 7,968 7,470 11,397 10,565	1971 - June 30, 1972 DIFICATION # 5 FROM -0- \$1,125 + \$ \$1,638

No Change in Money

100% Reimbursable Title VII

	Bilingual Early	July 1, 1971 - June 30, 1972		
3/10/72		BUDGET MODIFICATIO! # 4		
(C 405)	Travel	FROM \$1200	<u>TO</u> \$ 500	<u>CIM MGE</u> - \$ 700 + 700
(c 406)	Conferences + Expenses	Related - 0 -	700	+ 700

No Change In Money

100% Reimbursable PL 89-10 Federal Funded Title VII

BOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSINESS AFFAIRS BUREAU OF REINBURSABLE PROGRAMS PROJECT BUDGET 1971-1972

JA 148

of Program:	July 1, 1971 - June 30, 1972	!	
			CHI NGE
	FROM	10	0111
Travel	\$1200	\$ 500	- \$ 700 + 700
	of Program:	BUDGET MODIFICATIO! # 6	BUDGET MODIFICATIO! # 6

No Change In Money

100% Reimbursat e PL 89-10 Federal Funded Title VII

BOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSTNESS AFFAIRS BUREAU OF REIMBURGABLE PROGRAMS PROJECT BUDGET 1971-1972

JA 149

Bilingual Early Childhood Center Dist #14

a . World and a collection of the collection with the collection

Duration of Program: July 1, 1971 - June 30, 1972

1,/19/72

				*:
CODE	rion # 7 <u>ROM</u> 12,000	<u>'fo</u> \$13,000	+ \$ 3	
(Chil) Educational Research \$	500	750	+.	250
(ChO5) Travel	700	: 950	+ 1	250
(C406) Conferences + Related Expenses	2146	. 296	+	. 50
(C119) Art + Drawing Supplies	500	800	+	300
(Cill) Audio-Visual Supplies	. 5342	• - 561+2	+	300
(Cll3) Classroom Supplies		6300	٠.	2150
(C49!) Tuition (Para's)	81450	500	+	500
(Ch99) Services Not Otherwise Classified		200	+	200
(Cl+93) Admission Fees	-0-	6972	-	1498
(Clt94) Tuition - (Teachers)	71470	1218	-	202
(C779) Pupil Transportation	1450			- 0 -

No Change In Money

1.00% Reimbursable Fund Foundation Title VII

Student Population Data	(See Instr	Pre-	K	1	2	3	Other Elemen.	Second-	Total
Total ADM's of LEAW's for	Public (1) School	74.0	21:00					-	
preceding school year	Nonpublic (2) School	0	.0	·.		-			
dominant language is not English	Public (1) School	565	1835						
	Nonpublic (2)	0_	0		<u> </u>			·	
school year	Public (1)	60	200		<u> </u>	-	-		
	Nonpublic (2)	0	10			-			-
. Ember of children in project	Public (1)	48	160				-		
area whore dominent language is	Nonpublic (2)	0	10		-		-		-
. Number of children in project area whose dominant language is	Public (1)	20	32			1 -			-
not English who would partici-	Nonpublic (2)	0	0		-	-			
f. Number of children in project area whose dominant language is	Public (1)	_10	18	· _		-	ļ	-	-
English who would participate	Nonpublic (2)	0	0			_		-	-
in the project g. Total number of children in	Publiqe(1) + f(1))	30	50	-	-	-	-	-	-
project area who would partici-	Nonpub. (e(2) + f(2)			-	-	-	-	-	
pata in project (Add and f)	Total (g(1) # g(2))	30	50				chool was	1	

* Add: The aggregate of the daily membership for the school year divided by actual days school was in session
** LFA: Local Educational Agency

XX Non-public schools will not participate during the first year since there aren't any pre-K and components in the project area. However, Non-public school teachers will participate in the training program.

SECTION C' - TOTAL PROJECT PARTICIPANTS (Continued) 2. Additional Project Data (See instructions on page 111) a. Total student participation (Total Clg)...... Number 80 Staff engaged in inservice training..... Number b. Adults..... Number Total number of project participants (a through c). Number 166 Percent of "a. Total student participation" whose dominant language is not English and who come from low-income families..... Percent 65 Projected per-pupil cost...... Cost f. Estimated percentage of target group which is: Rural (fewer than 2500 inhabitants)..... Percent Urban (2500 or more inhabitants)..... Percent Estimated percentage of children from migrant families..... Percent i. Dominant Language(s) other than English SPANISH xx Each child's parent or guardian will participate in the projecta SECTION D - PARTICIPATING SCHOOLS (See instructions on page 112) Names of Participating Location of Grade Participation (Number) Schools Schools Classes | Students per Grade Level Level(s) P.S. 122 68 Harrison Pre-K 30 Avenue K 50 Brooklyn, N.Y.

SECTION A - Project Summary

The District 14 Bilingual Pre-School Learning Center will serve as an Early Childhood Bilingual Demonstration Center within the Williamsburg-Greenpoint section of Brooklyn, an area with a school population of 29,000 children where almost 65% are of Spanish-speaking background.

The major emphasis of the Bilingual Pre-School program will be in developing skills in the dominant and second language through carefully planned activities which can be measured in terms of behaviors.

Language will be the program called DISTAR. Distar will form the base care for the structured lessons of language in Pre-K and Language and Readiness in Kindergarten. The Distar program will utilize both Spanish and English as mediums of instruction. The children will be taught two lessons daily; one in their dominant language and the same lesson in their second language.

The periods of work/play, music, literature, physical activities, cultural, enrichment, etc., will allow for the normal flow of communication in a mixed small group setting. Blocks, teleplay, theater, doll corner, and an array of multisensory games and activities will facilite the use of both languages. The teacher and paraprofessional will utilize this period of activities to reinforce vocabulary and concept development in the childs dominant and second language; and will maintain a small group instructional setting.

A Family Worker and a Family Assistant who are bilingual will provide special services to parents both in and out of school. During school hours they will meet with parents in the 'amily Room to discuss the bilingual program and to assist parents with their problems and offer possible solutions.

Public School 122 will house the Pre-School Learning Center for both the Bilingual and non-Bilingual components. Of the schools 340 Pre-Kindergarten and Kindergarten students, 30 Pre-K

JA 153

Continued:

and 50K children will participate in the Bilingual Demonstration Project. Of these children 65% will be chosen because of their dominance in the Spanish Language and 35% will be chosen because of their dominance in the English Language. This dominance will be determined through questioning the child's parents at registration and an oral interview with the child conducted by a team of bilingual parents and teachers. (Bilingual Program Committee of District 14).

-	PROGRAMS UND	F0 011	DASHIN	ATION ACT, TI	TLE VII. ESE	FA (P.L. 90-2)	47) FUND\$	BEFORE C	INSTRUCTIONS OMPLETING FORM	FORM APPRO	
WE AND A	DDRESS, OF AGEN	outh 1	First St.,	B'klyn, N	.Y. 1120	PHOJECT NUM 4203		OEG-0-70		New York	
	PART I - EXPE			(Check PR	POSED BUDGE	T SUMMARY	Name and	ATED EXPENDITURE		BUDGET PERIOD (E BEGINN NG July 1, 19	ENDING .
EXPE	NOITURE ACCOU	NTS			EXPENS	E CLASSIFICA	HOIT			TOTAL	NEGOTIATED
FUN	CTIONAL SIFICATION	ACC'T		NOM-	CONTRACTED	MATERIALS AND SUPPLIES	TRAVEL	EQUIPMENT	OTHER EXPENSES	EXPENDITURES	BUDGET
2277	(1)	(2)	PROFESSIONAL (J)	PROFESSIONAL	(5)	(6)	(7)	(8)	(9)	(10)	(11)
Adminis		100	s	5	s	\$ 827	\$		\$ 750	1,577,-	\$
2 Instruct	ion	200	1,3.998	51,025	9,984	-8,060	91,8,-		590.	111,605	
Attende	ance Services	300						-			
4 Health	Services	400		17.17							
5 Pupil 7 Service	Fransportation	500			1,375.	 		-		1,375	
6 Operati	on of Plent	600						1.	-		
7 Meinter	nance of Plant	700						-	-		-
g Fixed	Charges	800	6,650	8,655				-	5,226	20,531	
9 Food S	ervices	900			-					-	
10 Student		1000				-	-	1 2 - 1 - 2	-	-	
11 Commu	mity Services	1100							-		+
12 Remode	eling	12200									-

948.-

8887.

\$11,359

\$ 59,680.-

\$ 6,566.-

138,088.

15 Negotiated Budget

13 Capital Outley (Equipment only)

1230

· 50,6L8.-

3H 30 THE RASS DEPARTMENT OF HEALTH, EDUCATION, AND WELFAR בדא, דעטבגלונה OFFICE OF EDUCATION PLEASE RZED HISTHUCTAGES -IAT FORM APPROVED WASHINGTON, D.C. 29298 Q.M.S. NO. 51-ROS37 PROGRESS UNDER BILINGUAL EDUCATION ACT. TITLE VIL ESEA (P.L. 90-247)
PART III - PEOPOSED BUDGET CUMHARY/EXPENDITURE REPORT OF FEDERAL FUNDS BETORE COMPLETING KCURANS UNDER BIL NUUAL EDU THIS FORM MOLTA THE PROPOSED BULLET SUMMA LA ACONESS OF ALENCY New York HARE AND ADDRESS OF AGENCY OEG-0-70-3472 District 14, 310 South First St., B'klyn, N.Y. 11206 420330 BUDGET PERIOD (MMIA, day & year) ESTIMATED EXPENDITURE REPORT BEGINNING (Check APROPOSED BUDGET SUMMARY B July 1, 1913 June 30, 1974 FINAL EXPENDITURE REPORT PART 1 - EXPENDITURES (Attach detail echedules) One) NECOTIATED TON EXPENSE CLASSIFICATION TOTAL EXPENDITURE ACCOUNTS EXPENDITURES BUDGET MATERIALS OTHER SALARIES EQUIPMENT CNTRACTED TRAVEL EXPENSES SUPPLIES ACC" FINCTIONAL SERVICES -CLASSICICATION HO. (11) (10) PROFESSIONAL (9) PROFESSIONAL (8) (7) (6) (5) (4) (2) 1,150.-600 .-\$ 550 100 Acmidistration 650 1.000 200 - 5.800 11.600 63.511 .-Instruction 61,063 .-300 Attendance Services 400 Health Services 1.300 Pupil Transportation 500 1,300 Services 600 Operation of Plant 700 Maintenance of Plant 23.561 .-200 12,142.-11,419 .-Fixed Charges 900 Food Services Student-body 1000 Activities 1100 Community Services 12200 Remodeling Capital Octlay
(Equipment caty) 1,000. \$12,900 8,350. \$75,653.-TOTAL 15 Negotikted Didget

OE FORM 4491-2, 5/70

SUMMER COMPONENT

EXPENDITURE ACCOUNT NO. 100 ALMINISTRATION

					Page 15 days and the second second second	
EXPENSE CLASS	NAME AND TITLE, PURPOSE OR TITLE	PROJE	CT TIME PART	QUANTITY	SALARY RENTAL OR UNIT COST	BUDGETED . AMOUNT
OFFICE SUPPLIES:						
Off	ice Supplies					\$ 100.00
Tel	ephene Services					100.00
						69
						JA 1
						156

STYMER COMPONENT

EXPENDITURE ACCOUNT NO. 200 INSTRUCTION

				QUANTITY		
EXPENSE CLASS	NAME AND TITLE, PURPOSE OR TITLE		PROJECT TIME		SALARY RENTAL OR UNII COST	BUDGETED
SALARIES:						
PROFESSIONAL:						
Tea	chers (4)		x	4 x 78 hz	12.22/hr	\$ 3,813.00
NON-PROFESSIONA				4 x 96 hrs	3.91/hr	1,502.00
Ech	cational Assistants (4)		× .	1 x 96 hrs		368.00
Fan	nily Assistant (1)		, z	1 x 90 ms	3.03/112	
				*		
MATERIALS:						
Audie	Visual Supplies	1				100.00
Inst	ructional Supplies	10.00			*	200.00
్ ఒక్కిమిక వె						A 157

SUPER COMPONENT

EXPENDITURE ACCOUNT NO. 200 INSTRUCTION

			and the same of th		
EXPENSE CLASS	NAME AND TITLE, PURPOSE OR TITLE	PROJECT TIME	QUANTITY	SALARY RENTAL OR UNIT COST	BUDGETED AMOUNT
OTHER EXPENSES:					
Parent Inve	olvement				150.00
				2	JA 158

EXPENDITURE ACCOUNT NO. 500 PUPIL TRANSPORTATION SERVICE

			-	Section and a remaining section of the section of t		or programment in the programment control of first to
EXPENSE CLASS	NAME AND TITLE, PURPOSE OR TITLE	PROJECT TI	ME ?T	QUANTITY	SALARY RENTAL OR UNIT COST	BUDGETED
TRIPS:						300.00
					2	JA 159

SUPPER COMPONENT

EXPENDITURE ACCOUNT NO. 800 FIXED CHARGES

				-
EXPENSE CLASS NAME AND TITLE, PURPOSE OR TITLE	PROJECT TIME	QUANTITY	SALARY RENTAL OR UNIT COST	BUDGETED AMOUNT
Secial Security (para-professionals)				113.00 73

SCHOOL YEAR 1973- 1974

EXPENDITURE ACCOUNT NO. 100 AIMINISTRATION

EXPENSE CLASS	NAME AND TITLE, PUPPOSE	PROJEC	T TIME	QUANTITY	SALARY	BUDGETED
	OR TITLE		PART		RENTAL OR UNIT COST	AMOUNT
OFFICE SUPPLIES:	co emplies			,.		\$ 300.00-
Poste Teley						150.00 500.00
						•

EXPENDITURE ACCOUNT NO. 200 INSTRUCTION

			The second line of the second li	The same of the sa	THE RESERVE OF THE PROPERTY OF
EXPENSE CLASS NAME AND TITLE, PURPOSE OR TITLE		T TIME	QUANTITY	SALARY RENTAL OR UNIT COST	BUDGETED AMOUNT
SALARIES:					
PROFESSIONAL: Coordinator (teacher assigned)				19,250.00	19,250.00
E.S.L. Teacher	x		1	16,500.00	16,500.00
S.S.L. Teacher	X.		1	14,250.00	14,250.00
Curriculum coordinator	x		1	10,250.00	10,250.00
NON-PROFZSSIONAL:			7 5		
Senier Stenegrapher	*		1	8,000.00	8,000.00
Teacher Aide (1)	x		1x220x5.5	3.42/hr	4,139.00 €
Educational Assistants (9)			9x220x5.5	4.10/hr	44,649.00
Family Assistant (1)			1x220x5.5	h.01/hr	4,853.00
	1.4		1, 1		

SCHOOL YEAR 1973 - 1974 EXPENDITURE ACCOUNT NO. 200 INSTRUCTION

EXPENSE CLASS NA	ME AND TITLE, PURPOSE	PROJEC	T TIME PART	QUANTITY	SALARY RENTAL OR UNIT COST	BUDGETED AMOUNT
CONTRACTED SERVICES:						
Evaluation						4,500.00
Audit		1				2,000.00
New York Univer	sity (professionals)			60 cred.	85.00/cred	5,100.00
MATERIALS AND SUPPLIES:						
Textbooks						2,000.00
Instructional Ma						3,000.00
Audio Visual Sun	pplies					500.00
Tasel Convention expenses - Coord	(dir fare and related linator and one teacher)					1,000.00
				\		

EXPENDITURE ACCOUNT NO. 200 INSTRUCTION

EXPENSE CLASS NAME AND TITLE, PURPOSE OR TITLE	PROJEC	I TIME PART	QUANTITY	SALARY RENTAL OR UNIT COST	BUDGETED
OTHER EXPENSES:					
Parent Involvement Fund					500.00
					JA* 164

ECHOOL YEAR 1973 - 1974

EXPENDITURE ACCOUNT NO. 200 INSTRUCTION

EXPENSE CLASS	NAME AND TITLE, PURPOSE OR TITLE	PROJEC	T TIME PART	QUANTITY	SALARY RENTAL OR UNIT COST	BUDGETED AMOUNT
OTHER EXPENSES:			•••			
Parent Inve	vement Fund	***				500.0
						78
						JA 165

SCHOOL YEAR 1973 - 1974

EXPENDITURE ACCOUNT NO. 800 FIXED CHARGES

# 1.10			-				
EXPENSE CLAS	SS NAME AND TITLE, PURPOS OR TITLE	E	PROJECT	TIME PART	QUANTITY	SALARY RENTAL OR UNIT COST	BUDGETED
FRINGE BENEFITS:							
PROFESSIONA	LS:						6.310.00
R	etirement	y					6.140.00
H	aximum Annuity fund				2		400.00
✓~ . F	ealth						960.00
	elfare						1,360.00
	Social Security						2,559.00
NON-PROPESS	SIONALS						
Secretary	Health	170	2:			1.7	240.00
	Welfare						250.00
	Pension		1 1 4 2			15	1,461.00
	Social Security		1				1,80.00
						1	
				•			

CHOOL TELE 21973 - 1974

EXPENDITURE ACCOUNT NO. 800 FIXED CHARGES

EXPENSE CLASS NAME AND TITLE, PURPOSE OR TITLE	PROJECT TIME FULL PART	QUANTITY	SALARY BULCO RENTAL AMOU OR UNIT COST
Para-prefessionals Secial Security Health Welfure			3,21 2,66 37lo

to the contract of the traction and the very all bands THE PART PROPERTY AND A STATE OF 54-47601 NOTIFICATION OF GRANT AVARD (Sinela Signature) 1. MAM: AN: AUDIM 55 OF INSTITUTION Sectioned, City, State, and ZIP Code) Z. GRANT NUMBER OEG-0-70-3472 New York City Board of Education for I. FHOME T NUMBER Community School District #14 S0B0330C 110 Livingston Street 4. AMOUNT Brooklym, New York 11201 ; 128,765. (Increase) S. FERIUS OF GRANT (Shath, Day, Your) THRETIAN 6. MAKE CHECKS PAYABLE TO: Littended 5/30/74 New York City Board of Education 7. GHAHT AWAHD IS (Check the) Brooklyn, New York 11201 OEG-0-70-3472 Only A. [] 168 W D. [X REVISED 8. PHOPOSAL Bilingual Early Childhood Canter for this period. 9 SCOPE OF WORK AND OR SPECIAL CONDITIONS Score of Work: As set out in the existing grant document and modified by 8. above included herein by reference and the approved budget of 7 pages attached hereto except that the grantee understands that any amount in excess , appearing in the revised budget for the period of this extension is to be supported either by carryover funds previously obligated under the grant or from non-Federal funds to be supplied by the grantee and that in the event such additional funds are needed and not made available the grantee will revise and submit for the grants officer's approval a budget modification conformable to the funds available within 30 days of its knowledge of such reduced funds availability. Special Conditions: Effective from the date of signature in Block 12 below, the grant is modified by the application of special grant terms and conditions numbered 1 through 8 attached hereto and any additional requirements made. applicable to the grant by virtue of their publication in the Code of Federal Regulations, 45 C.F.R. 123.1 through 123.51 effective prior to execution of this amendment. Additional "echnical Requirements: The grantee further understands that it is responsible for carrying out the following additional technical requirements, None 10. CHANT AUTHORITY CAN: 2002878 APP. 7530292 20 U.S.C. 880 h-3. (a) APPROVED 12. DATE 11. HAML OF GRANTS OFFI I II (Pleuse type) 6/ 173 John H. Getreu

11, MANATURE OF AUTHORIZED COVERNMENT OF FICIAL

00

		. Dir		E OF COUCATION	AND RELFARE				a author dus	FORA APPR	
	PROGRAMS UN PART III - PROPOS	LINGUAL EDUC DGET SUMMARY	ATION ACT, TI	TLE VII, ES: E REPORT O	P FEDERAL	FUNDS		FCR'A	о.м.в. нэ. споэт		
ik	LE AND ADDRESS OF AGE	4CY				PROJECT NO	UCR	GRANT NUNU	LI	STATE	
i	strict 14, 310	South	n First Str	eet, B'kly	n, N.Y.	4203	30	CEG-0-7	70-31,72	New York	
	PART I - EXP	ENDITU	RES	(Clock Fire	POSED BUDGE	T SUMMARY		ATED EXPENDI		7/1/73	(/30/7)
_	EXPEND TURE ACCO	107. 6			EXPENS	E CLASSIFICA	TION			1/1/1	
_	ENTENDIORE ACCO	1	SALA	ARIES		MATERIALS	1	1		TOTAL	HEGOTIATED
	FUNCTIONAL CLASSIFICATION	NO.	PROFESSIONAL	HON- PROFESSIONAL	SERVICES	SUPPLIES	TRAVEL	EQUIPMENT	EXPENSES	EXPENDITURES	BUDGET
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	. (11)
1	Administration	100	:	s	\$	s 150	s		\$ 500	\$ 950	\$ 950
:	Inetruction	200	60,250	51,719	1,620-	3,055.	-2,000-		500	-121,344.	121,2 1
	Attendance Services	300						-			
1	Health Services	400			<u> </u>						· · · · ·
5	Pupil Transportation Services	500			2,000.					1,000	1,000
	Operation of Plant	600									200
7	Metateasace of Plant	700	<u> </u>								
0	Fixed Charges	603	11,479	10,283						21,707	21,707.00
5	Food Services	900					-	1			31
0	Student-Lody Activities	1000									
1	Community Services	11:00						1:			`
2	Remodeling	1220c		* *		٤		1			
3	Cepital Outley (Equipment only)	1230		• 100	3, 3						
1.	TOTAL	L>	\$ 71,669	62,007	5,620.	3,705	1,000.	- 3	1,000	71.5.00	1
15	Negotieted Dudget			3	\$.	\$	\$	\$	3	THE PARTY.	: 145,00

CHOOL YEAR 1973 - 1974

XPENDITURE ACCOUNT NO. 100 AIMINISTRATION

	. ,					
XBENZE, CTV22	NAME AND TITLE, PURPOSE	PROJECT T		QUANTITY	SALARY, RENTAL OR UNIT COST	IUDCETED AMOUNT
	· ·					
OFFICE SUPPLIES	•		1			
! 0	ffice Supplies -	.	1			\$ 300.00.
	ostage					150.00
. T	elephone					. 500.00
)			
•						.1
				•		
	7			•	•	\
					:	170
i						

HCOL YEAR 1973 - 1974

PENDITURE ACCOUNT NO. 200 INSTRUCTION

PENSE CLASS	NAME AND TITLE, PURPOSE	PROJEC	QUANTITY	SALARY, RENTAL OR UNIT COST	EUDOCTED AMOURT	
ALARIES:						
PROTES	SSICNAL:			,		
	Coordinator (teacher assigned)	х	1	19,250.00	\$ 19,250.00	
	E.S.L. Teacher	x	. 1 .	16,500.00	16,500.00	
	S.S.L. Teacher	x .	1	14,250.00	14,250.00	
	Curriculum Coordinator	x	1 -	10,250.00	10,250.00	
NCI -PRO	DEDSSICHAL					
	Senior Stenographer	x	1	8,000.00	8,000.00	,
4F .	Teacher Aide	x	1 x 220 x 5.	3.42/hr	4,139.00	
*	Educational Assistants	x	7 x 220 x 5.	4.10/hr	.34,727.00	
. #-	Family Assistant	x	1x 220 x 5.	d 4.01/hr	1,853.00	JA
				.4.		171
Please note	: 220 working days per school year			1	1	
	p hours per day	THE STATE OF	1	1	1	

MOOL YEAR 1973 - 1974

PENDITURE ACCOUNT NO. 2000 INSTRUCTION

PENSE CLASS	NAME AND TITLE, PURPOSE	TIME	QUANTITY	SALARY, RENTAL OR UNIT COST	EUDCETED AMOUNT	
ONTRACTED SEI	RVICES:					
	Evaluation -				\$ 3,000.00	
	New York University		18 cred.	90.00/cred.	1,620.00	
TATERIALS AND	SUPPLIES:					
	Textbooks				1,000.00	
	Instructional Materials				1,800.00	1.
1	Audio Visual Supplies				455.00	
RAVEL:		 				
	Tesol Convention (air fare and related expenses - Coordinator and one teacher)				1,000.00	
THER EXPENSES			1		1	C A
	Parent Involvement Fund			4,	. 500.00	172
· 						•
			. 4.5		f:)

HCOL YEAR 1973 - 1974

PENDITURE ACCOUNT NO. 500 PUPIL TRANSPORTATION SERVICE

PENSE CLASS	NAME AND TITLE, PURPOSE	PROJEC FULL	T TIME PART	QUANTITY	SALARY, RENTAL CR UNIT COST	EUDGETED /MOUNT
US TRIPS:						
	School bus trips for trips for cultural and enrichment purposes					\$ 1,000.00
					+	
· /						6
		-				
						JA 1
						173
					1	
				-		Line and the second

TYPDITHE ACCURIT NO. 800 FIXED CHARGES

	The same of the sa		-				
JENGE CLASS	NAME AND TITLE, PURPOSE		TART	QUANTITY	SALARY, RENTAL OR UNIT COST	BUDGENED AMOUNIT	
PEGE BENEFITS	S:						•
M. W.	Retirement Reximum Annuity Fund Celath Celfare			•		6,1h0.00 h00.00 960.00 1,360.00	
:-PROFESSIONAL	ocial Security			· ·		2,559.00	1.
Wa	elfare ension				- (21,0.00 250.03	
	ocial Security	÷				1,461.00	JA 174
Не	cial Security Alth Ifere				4.	2,637.00. 2,160.00	

(ie-57) CODE SOL NUMBER VENTOR ACC	ומטג .
Approved frame from grant awarded for prior budget period shown above Unexpended frame from grant awarded for prior budget period, southerhood for expenditure this budget period. Approved grant award for budget period shown above S TOTAL FURS AUTHORIZED FOR BUDGET PERIOD ABOVE. S TOTAL FURS AUTHORIZED FOR BUDGET PERIOD ABOVE. S PART III — CUMULATIVE TOTALS — GRANT AVARDS AND CASH RECEIVED SINCE PROJECT BEGAN FOR JUMPAN AND THE STANDARD AND CASH RECEIVED SINCE PROJECT BEGAN FOR JUMPAN AND THE STANDARD AND CASH RECEIVED SINCE PROJECT BEGAN FOR JUMPAN AND THE STANDARD AND CASH RECEIVED SINCE PROJECT BEGAN FOR JUMPAN AND THE STANDARD AND CASH RECEIVED SINCE PROJECT BEGAN FOR JUMPAN AND THE STANDARD AND CASH RECEIVED SINCE PROJECT BEGAN FOR JUMPAN AND THE EXPENDITURES INCLUDED HEREIN ARE DEEMED PROPERLY CHARGEABLE TO THE OF PROJECT DIRECTOR. FOR OFFICE OF EDUCATION USE GRAY ACCOUNTING DATA PROGRAM AND CASH RECEIVED TO DATE FOR OFFICE OF EDUCATION USE GRAY ACCOUNTING DATA PROGRAM AND LINES AND CASH OF SECONDARY MUMPER ACCOUNTING BOTAL PROGRAM ACCOUNTING BOTAL PROGRAM AND CASH RECEIVED AND COLD AND	
Sinespended funds from grant awarded for prior budget period. Sinespended funds from grant awarded for prior budget period. Sinespended funds from grant awarded for prior budget period. Sinespended grant award for budget period shown above. Sinespended grant award grant award grant g	
AND OPEN PROJECT DIRECTOR FOR OFFICE OF EQUICATION USE OFFICER DATE FOR OFFICE OF EQUICATION USE OATH A PRODUCT PERSON WILL FOR PROJECT DIRECTOR. FOR OFFICE OF EQUICATION USE OATH A PRODUCT PERSON WILL SHOW A PROJECT DIRECTOR. FOR OFFICE OF EQUICATION USE OATH A PRODUCT OATE FOR OFFICE OF EQUICATION USE OATH A PRODUCT OATE ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain with an extense (*)) ACCOUNTING DATA Program vilices will complete remain will be extense of the program vilices will complete remain will be extense of the program vilices of the program vi	
OTAL FURDS AUTHORIZED FOR BUDGET PERIOD ABOVE Senditions during biodect period shown above Senditions authorized for expenditure during biodect period Senditions of funds authorized for expenditure during biodect period Senditions of funds authorized for expenditure during biodect period Senditions of funds authorized since the funds and cash received since project Began Senditions of funds authorized since period since pe	
enditions during budget period shown above spended bilance of funds authorized for expenditure during budget period spended bilance of funds authorized for expenditure during budget period spended bilance of funds authorized for expenditure during budget period spended bilance of funds authorized for expenditure during budget period spended bilance of funds authorized for expenditure during budget period spended bilance of funds authorized for expenditure during budget period spended bilance of funds authorized for expenditure during budget period spended bilance of funds authorized for expenditure during budget period spended bilance of funds authorized funds spended bilance of funds spended bilance of funds and funds spended bilance of funds spended bilance of funds spended bilance of funds and funds spended bilance of funds and funds spended bilance of funds spended bila	
PART III — CUMULATIVE TOTALS - GRANT AVARDS AND CASH RECEIVED SINCE PROJECT BEGAN all amount of front owards recedit plate. S AL AMOUNT OF FEDERAL CASH RECEIVED TO DATE SCAL REPORT IS CORRECT AND THE EXPENDITURES INCLUDED HEREIN ARE DEEMED PROPERLY CHARGEABLE TO TO UNE OF PROJECT DIRECTOR FOR OFFICE OF COUCATION USE ONLY ACCOUNTING DATA (Platian offices all complete items material with an assenak (*)) ACCOUNTING DATA (Platian offices all complete items material with an assenak (*)) ACCOUNTING DATA (Platian offices all complete items material with an assenak (*)) ACCOUNTING DATA (Platian offices all complete items material with an assenak (*)) ACCOUNTING DATA (Platian offices all complete items material with an assenak (*)) ACCOUNTING NO. 16-15) (15-15) (19-28) (19-28) (19-21) (19-21) AMOUNT (Platian offices and County Tive Could be controlled with an assenak (*)) AMOUNT (Platian offices and County Tive Could be controlled by County Tive Co	
PARE III — CUMULATIVE TOTALS — GRANT AVARDS AND CASH RECEIVED SINCE PROJECT BEGAN AL AMOUNT OF FEDERAL CASH RECEIVED TO DATE SAL AMOUNT OF FEDERAL CASH RECEIVED TO DATE DATE FOR OFFICE OF ADUCATION USE GRILY ACCOUNTING DATA Problem affices afficiently marked with an osterock (*)) ACCOUNTING DATA Problem affices afficiently marked with an osterock (*)) ACCOUNTING DATA PROBLEM ACCOUNTING NO. ACCOUNTING NO. 10-15) (15-15) (15-15) (19-28) (19-21) (33-41) AMOUNT (DOTATE) CODE (15-15) (19-28) (19-21) (33-41) AMOUNT (DOTATE) CODE (15-15) (19-28) (19-28) (19-21) (33-41)	1000
PART III — CUMULATIVE TOTALS - GRANT AVARDS AND CASH RECEIVED SINCE PROJECT BEGAN ALL AMOUNT OF FEDERAL CASH RECEIVED TO DATE SCAL REPORT IS CURRECT AND THE EXPENDITURES INCLUDED HEREIN ARE DEEMED PROPERLY CHARGEABLE TO TO THE OF PROJECT DIRECTOR FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA Program attices will complete Home marked with an asteriak (*)) APPROXIMATION EXPRISED PROJECT DIRECTOR FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA Program attices will complete Home marked with an asteriak (*)) APPROXIMATION EXPRISED PROJECT DIRECTOR FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA Program attices will complete Home marked with an asteriak (*)) ACCOUNTING DATA Program attices will complete Home marked with an asteriak (*)) ACCOUNTING DATA PROGRAM EXPRISED PROJECT DIRECTOR FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM ACCOUNTING DATA PROGRAM FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA PROGRAM ACCOUNTING DATA	00
AL AMOUNT OF PEDERAL CASH RECEIVED TO DATE SCAL REPORT IS CURRECT AND THE EXPENDITURES INCLUDED HEREIN ARE DEEMED PROPERLY CHARGEABLE TO THE OF PROJECT SISCAL OFFICER FOR OFFICE OF EDUCATION USE ONLY ACCOUNTING DATA (Program affices will complete items matried with an estensk (*)) APPROXIMATION EFFECTIVE DATE COLE DOCUMENT RUMBER COLE COLE COLE COLE COLE COLE COLE COL	1×'
AL AMOUNT OF PEDERAL CASH RECEIVED TO DATE SCAL REPORT IS CURRECT AND THE EXPENDITURES INCLUDED HEREIN ARE DEEMED PROPERLY CHARGEABLE TO T USE OF PROJECT DIRECTOR FOR OFFICE OF EDUCATION USE GNLY ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*)) ACCOUNTING DATA (Profiton offices and complete remains marked with an estensk (*))	
SCAL REPORT IS CORRECT AND THE EXPENDITURES INCLUDED HEREIN ARE DEEMED PROPERLY CHARGEABLE TO T UNE OF PROJECT DIRECTOR FOR OFFICE OF EDUCATION USE ONLY ACCOUNTING DATA (Professionalities and complete items marked with an asiensk (*)) APPROPRIATION SYMBOL ** EFFCITIVE HER COLE HOUSENT COLE HOUSENT HUMBER ACCOUNTING NO. 10-15) (15-15) (15-15) (19-26) (19-21) (22-41) AMOUNT HEGAN SECONDARY VENEZA COLE HUMBER COLE HUMBER (19-27) (19-27) (23-41) AMOUNT TIVE SO NON- VENEZA VENEZA COLE HUMBER COLE HUMB	
FOR OFFICE OF EDUCATION USE CRLY ACCOUNTING DATA (Professionalities alli complete Hemis marked with an ostensk (*)) ATTER SPENATION SYMBOL EFFECTIVE DATE OBLIGATION: EFFECTIVE DOCUMENT RUMBER CODE RUMBER (2) ACCOUNTING RO. (3-2) (3-2) ACCOUNTING RO. (3-2) (3-2) ACCOUNTING RO. (3-2)	
FOR OFFICE OF EDUCATION USE ONLY ACCOUNTING DATA Profession offices will complete terms marked with an astensk (*)) ADDRESHDATION SYMBOL* EFFECTIVE BEF, COLE BOCHMENT HUMBER COL HUMBER COL HUMBER COL HUMBER ACCOUNTING NO. INCIDENT HUMBER COL HUMBER ACCOUNTING NO. INCIDENT HUMBER COL HUMBER ACCOUNTING NO. INCIDENT HUMBER COL HUMBER COL HUMBER ACCOUNTING NO. INCIDENT HUMBER COL HUMBER ACCOUNTING NO. INCIDENT HUMBER COL HUMBER ACCOUNTING NO. INCIDENT HUMBER ACCOUNTING NO. INCIDENT HUMBER ACCOUNTING NO. INCIDENT HUMBER COL HUMBER ACCOUNTING NO. INCIDENT HUMBER	HE GRANT
FOR OFFICE OF EDUCATION USE ONLY ACCOUNTING DATA (Program offices will complete Home marked with an astensk (*)) ** APPROPRIATION STATE HEF OBLIGATION OUT OF HEF CODE HOME TO HOME	
ACCOUNTING DATA (Procum offices will complete items marked with an asterisk (*)) AFOR SPRIATION SYMBOL * EFFCCTIVE DATE COLE GOCUMENT RUMBER (2) CGD STOR COLE GOCUMENT RUMBER (2) CGD STOR COLE GOCUMENT RUMBER (2) CGD STOR COLE GOCUMENT RUMBER (3) CGD STOR COLE GOCUMENT RUMBER (4) CGD STOR COLE GOCUMENT RUMBER (4) CGD STOR COLE GOCUMENT RUMBER (4) COLE GOCUMENT GOCUMENT RUMBER (5) COLE GOCUMENT GOCUMENT RUMBER (4) COLE GOCUMENT GOCUMENT GOCUMENT RUMBER (5) COLE GOCUMENT GOCUMENT GOCUMENT RUMBER (6) COLE GOCUMENT GOCUMEN	
ACCOUNTING DATA (Processes will complete items marked with an asterisk (*)) ADDROPPHATION SYMBOL* EFFCCTIVE DATE CODE CODE CODE CODE CODE CODE CODE COD	
ACCOUNTING NO. ACCOUNTING NO.	
AMOUNT (100) SCI. PROTARY VENUDAR VENUDAR CODE CODE CODE CODE CODE CODE CODE CODE	
ACCOUNTING NO. 10-15) (15-18) (19-28) (19-31) (33-41) AMOUNT (Dollars and curits; Tive 5 30N- VENDOR VENDOR NUMBER (10-57) (5-5) (5-5) (5-5) (5-5)	
AMOUNT 10-15) (15-18) (19-28) (19-31) (30-41) AMOUNT 10-15)	CLASS
AMOUNT HEGA- 12 SCL! PIGNARY SECONDARY MANAGE CODE 21 SCL. NUMBER NUMBER CO	(42-45)
AMOUNT HEGA: SELV PRIMARY SECONDARY MANAGE CODE CODE CODE CODE CODE CODE CODE COD	
(Dollars and conta) TIVE TO HON- VENUOR SECONDARY MANACE CODE TO SCI. NUMBER NUMBER	
(io-57) (59) (60-74)	GCHENT
	ODE
	-0-44)
SUB-ACCOUNT THANS- MODE RE- GEMERAL MODERICAL PROCESS ANCE GO.	114
CODE CODE CODE ACCOUNT NUMBER CODE MENTS GOV	

2513	141- 3 C	Littoxit	3		űal İ		6 143									
	14 CE 6 AC 27 CF PU 14 T- 3 C	FILS-TE	CATEGER		CATT	C: 1 2	CAT 3	_ [112 _	TAT Z	C1.1 3	I TAD	C27 2	ETTA	CAT I	CAT Z	CAT 3
	14 LEV	EL 1		androno de la companya de la company												· · · · · · · · · · · · · · · · · · ·
SCHOOL 16	- 1617E		TCTALS CAT 2	CAT 3	5 C.52	5 - 0.53	194	151	93	53.17	15	6.63	£ C.E%			5
	. KO.CSI	175		75.12	C. (3	c.01	0.0%	0.6%	6.03	0.04	G.C*	c.ca	C,C2	0.02		c.c3
17						- 0.22	-2.12	390	179	431	- 1.9X	11	1.32	5 0.4%		-0.3
· · · · · · · · · · · · · · · · · · ·	- 160.01 -	35.31	17.63	504 40.54	5	3.34	C.5.	0.0%	0.01	3.04				0.61		1.21
16					0.01	c.c.	12.22	-19.03	54 -15.17	183	0.32	0.34	1.41	3.58		1 to 3 to 5
	105.01	- 15.3a	15.42	324	6.61	0.04	0.0%	0.0%	0.04	0.64	0.01	0.01	1.01	0.61	(.(1	C.C1 E
15					5	0.55-	43	573 - 54.2%	210 14.43	45E 31.33	4.5%	52	3.72		- 5.13	
		-41.18		357			o.0%	G.62	6.60	\$0.0	0.02	50.03	0.61	0.01	C.C2	0.01
::					0.03	49	504 56.62-	7.55	33	233	3.33	0.23	C X			:::
	162.67	7.0	- 5.43		c.03		C.C4	0.04	0.04	5.63	C.0%	Ç.C\$	6.61	0.68	C.(3	c.′
::)			10.42	0.00	216	12.77	92	- 36.1X-	27	13				, ' dA
	100.09	131	10.13	71.23	1 (.1:	0.08	C.12	0.0	3.68	0.12	C	0.14		;		176

The second secon

	ACE GREU					Ch COEA	. 2414			1/26	1.611	FLEFTC F	KING	Chin	ESE SPE	ANING	
' " W.U.F. L.E	A CF 507	IL5- 3	CATEGORY	ES	CAT 1	CAT 2	CAT 3' CAT 3	(11)	641 2	CAT 3	CAT 1	CAT 2	CATE	C21 1	CAT 2	CAT 3	
144.26	ACE CHEC POF PUP NT- 3 CA	ILS-"3"	CATEGER I	E \$	TIALI	AN SPEA	CAT 3	C#EL C#T 1	1647 2	-CAT 3	CATT	CAT Z	CATE	CAT I CAT I	CZT Z	C21-3	##17
CISTRICT	14 LEVE	L 1							· · · · · ·				<u></u>		···		
SCHEEL 34	CRANL	-CAT-1-	TOTALS CAT 2	-C41-3	4	- G.CI	401 70.04	20	1.72	73		c.2%	7	3.71	1	2.81	
	100.02		2.43		C.3%		2 C.3‡	1 C.25	6.02	0.5%	0.01	0.00	C.02	C.28	C.34	4.41	
55	1607	73		63.9	1.64	0:01	-60:54-	- 5.29 5.29		11.34	5.32	J.12	3.48	3.05			
	-103.61-					<u></u>	6.03	0.01			0.01	0.01	C.C\$		C.(1		
64			21.4			7.01	7.5%	-34:00	* 235 T1514T	479		1:37		0.01	C. C. X	0.19	
	702101				č.:	·			·	7.62	C.59	0.0%	C.CX	6.03	c. (\$	0.05	
					- 033	1 2.2.	323 27.21	>.::: >:::::	1e 2•30	117.54	-5.43	c	21	<u>1</u>		0.41	
	-150.25	7.14-	3:51-	- (5.37		8 2	C,41	٠	6.21	0.12	0.64	0.04	C.C2	0.21		c.51	
123					-1.15	0.04 0.04	136	262		456	3.34	0.53	0.58		-0.01		+
	-100.01-	-22:12	16.45	-61:52 -51:52	6.64	c	€.0₹			0.01	0.04	٥.(٤		3.61	C.C4		JA 1
124					7	0.03	100	20.73	154	335	- 16	17	33		•	5-	177
	792	151	15.58	475	. 6.64	6.01	6.31	. 0.64	C.03	0.08	0.03	0.03	C.21	. 0:63-		· · · ·	

はなれ

frit. 3.	1974	£ . · · · ·	دلسود ځ	Chiky As	in the same	1000000	1 2512		LA	1.60466	LAYLUT	FCEFTC		in Light		1-2-3
PLFE	62 64 64 64 64 64 64 64 64 64 64 64 64 64	115- 3 0	CATEGOR	IES	-11743		C 21 3	CAT I	CAT 2	CAT 3	CAT 1	CAT 2	CAT 3	CATI	CAT 2	CAT 3
T.UPE	CACE CACE EATOF FUR EAT- 3 CA	112-3-0		105	CATI	CAIZ	CAT 3 CAT 3	1340	K SFEEK	ING CAT 3	LATI	CAT Z	CAT 3	CAT I	CATZ	CAT 3
SCHOOL	14 LEV!		415	-car -												
132				786		0.54	505 51.84	16		214			0.61	0.04	C.C1	
	153.61	- 12.21-			16	3.2%	53 5.43	c.31	5.0%	C.13	0.0%	C.C.	C.C1	C. E 2	C.61	c.c3
147				· · ·		7.07	209	199	7.25	315	0.12	3.51	0.03	0.01	-0.01	0,.58
ž <u>-</u>	-100.00-		-e.C2	- \$0.08.	5	0.00	E.c.?	i.c.	0.02				C.61	C.21	C.C3	
14.2					- :.:4	0.0%	363	15.10	43	35.32	0.34	0.63	2	0.01	C.C. \$	2003
	-103.01 C88		- 2, 47	- 82337				-1107-C	0.11	0.64			(.63	C.C.		
157						2	1.7		55	340	6.75	3.45			2 C.21	3.31
	-100[0]	- 16.15	-7.55	- 72.24	4	1 4			0.04		C.C4	6.63	C.23	C.(3	C.C3	C.C1
1 - è							113	15.23	10.12	182	3.52	0.34				
·	-100.61-	22.53				2-			c			c	C.C1	0.61	- 0.03	
156					4			25				./3				
-	1/0/61-	- 21.42	- 5.29	59.25					0		0.09	0,00	(, (1		c.c:	0.64

735 234 46 455	STATE STAT								V	1, 1 L	CA1 3	CAT 1	1 . 4	C41 =	6.1.1	1 2	641 3
STREET 14 LEVEL 1 SCROOL CAPAC TOTALS CAT 2 LEVEL CAT 1 CAT 2 CAT 2 LEVEL CAT 1 CAT 2 CAT 3 LEVEL CAT 1 CAT 2 CAT 3 LEVEL CAT 1 CAT 2 CAT 3 LEVEL LEVE	STRICT 14 LEVEL 1	TOT NUMBER OF P	CATEGORI	CATEGER	1125	6211	641 6	CAL	CALL	C41 6	CEI 3	CAT 1	C=1 2	Cal 3	CATI	C21 2	CAT 3 -
1574L CAT 1 CAT 2 CAT 3	1572L CAT 1 CAT 2 CAT 3																
1242 564 124 714	1242 554 124 714	75726			CAT-3-	15	· .	156	332	112	484	36	15		17	é	22
27	27	1242			714		3		<u>-</u>	a	1	c	c	c		1	I.61
735	735					21	Ç	219	204	46	233	3	C	3	C	C	c
### 20 777	210 777							6.01			c		6.63	c			
2.0 7.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0	200 74 5002 0751 1700 6562 207 168 222 41 25 1.14 0.44 29450 19.04 9.08 34.7% 1.1% 0.5% 1.2% 0.2% 0.1% 1.04 0.44 29450 19.04 9.08 34.7% 1.1% 0.5% 1.2% 0.2% 0.1% 1.04 0.44 29450 19.04 9.08 34.7% 1.1% 0.5% 1.2% 0.2% 0.1% 1.05 0.04 20.00 10.00 20.00 20.00 10.00 2		75	20	777	3.84	2252	64.07									
TUTALS 18963 4327 2025 12612	1.44 0.44 29452 19101 9108 34178 1.18 0.58 1.28 0.28 0.18 TUTALS 18983 4327 2029 12612	100:01	2 - 62	2:33-	-estit-			76.62	0.00	0.02	C - C Z	0.04	c.c3	C.13	0.01	c.c3	6.03
100.01 21.68 16.74 66.51 10 71 71 10 0 0 0 1 3 24 24	100.01 21.00 10.00 10.00 27 71 5 0 0 0 1 3 24 24		4327	2625	12612	1.54	0.42	79:57	19.52	1700	34.7%	207	166				
			21.60		-22.51		7	71		6.54	0.08		0.02				
											•						

	. 1.14									000/62 I		F1 F8 77.	F 1 5 1 5 -				
, L4:	CUSCE CALL	: 2			LAGEI	SH SPEA	×166 .	ALL F	UERIC F	ICAN	SPAR	FLERTO	AKING	CHIN	ESE SPE	AFINC	
- 1 No	CEAT- 3 CA	1660816	CATEGOR I	152	2/11	CAT 2	CAT 3	CAT 1	C4T 2	CAT 3	CAT 1	CAT 2	CAT 3	CAT 1	CAT 2	CAT 3	
	CLACE CHOL						KING			146	FRE	WCH SPE	AKING		CN-ENGL	ISH SPE	2 × 1 × G
	CONT- 3 CA						CAT 3										
CISTFIC	7 14 LEV	L 2															-
SCHOOL			TCTALS														
33	1482		5		1.34	-0.08	1030 -70.13				0.01				C.01		
	-103.53-					c	6.3	C•94	C.C.1	0.0%			C.C1	0.08	C.(1		
45	1325	336					234 17.71	201	74 5.63	-48.44-	1.21	13	0.24		-6.51	3.31	
	100.02	25.4%	8.57	-64.21	1	o	0 C.OA	0.03	6.00	0.01	0.02	The Market Laboratory of the State of	C.C2	6.03	C.C\$		
					3.27		11.53-	2.35		- 59:49	J.23	2.17	1.42	3.63		C-01	
	11.0.62	- 5.01	7.52	53.14			G , 2 1		C.C%	c	2	с	c	C.21	6.03	C.21	
					c.ci	- 3.07	21.22	4.72		613	2.37				C	7.81	
	100.63		5.51		3.01	3.01	:.15	0.37	6.60	0.24	0.04		6.68		C.C1	0.63	
143	* ***				-:.75	7.32	- 51.34	4.75		355	0.03						-
	-102.02		154	1105		14	1.24	0.00	C.C.	0.14	C.C4	6.63	C.C4	10 · 74	C.23	- ,,,-	A
:13					-1.65	-0.01	435	106	31	643	. 11	7	. 3	4	, ,	5	180
	130101		7.41	54.73		5	5.03	2	. 0.63	0.24	0.63	0.03	6.13	C.23			

14: C	CACE CFCC ER CF PUI EAT 3 C	PILS- 3 ATEGORIE	CATEGER!	ies	GL1 CAT 1 CAT 1	CAY 2	CAT 3	CATI	CAT 2	CAT 3	LAYOUT NCN- SPAN CAT 1 CAT 1	CAT 2	CAT 3	- CAT 1	CAT 2	CAT :
L21.60	LACA CACC ER CF FUR EN1- 1 CA	P 115- 3	CATEGORI	155	TALI	ON SPEA	KING CAT 3	1713	CAT Z	CAT 3	CAT 1	CAT Z	CAT 3	CAT T	CA-ENG	CAT :
2	7:51				1.54	1.44		8.35	3.14	45.25	0.61	1.1.	(.5%	C+11	(.11	C.31
	160.01	16.9:	6.11	£3.02	- 2.22	0.22	c.32-	6.65	L-0.02	-0.15	0.03	C.C.	- 0.05	0.21	6.61	C.21
44.	75654	5161	2495	11895	1.4%	0.72	31.44	14.53	7.33	31.22	1.04	3.9%	1.13	0.21	6.11	0.31
	166.01	15.41	5.44	71.33	-5.22			0.08	c.c.	0.03			-6:01	0.12		
·									-							
																•
							-									
															7.	
						£							•			——
															-	

OFFICE OF REIMBURSABLE PROGRAMS JA 182

SCHOOL DISTRICT 14, BROOKLYN 310 SOUTH FIRST STREET BROOKLYN, NEW YORK 11211

DISTRICT FOURTEEN'S HEBREW DAY SCHOOL LANGUAGE DATA SURVEY

SCHOOL	TOTAL ENROLLMENT	TOTAL NON-ENGLISH DOMINANT	PERCENTAGE OF N-E DOMINANT
Yeshiva Arugath Habosem	260	208	80%
Ahavas Yisroel-Yeshiva	420	315	75%
Yeshiva Beth Yeshaya	110	105	75%
Yeshiva Benai Mordechai	80	72	90%
Beth Jacob H.S.	450	135	30%
Beth Jacob Elementary	210	73	35%
Bnos Yaakov	750	525	70%
eshiva Belz	250	213	85%
Bnos Yerusalem	80	60	75%
Yeshiva Benai Yesoscher	100	95	95%
Yashira Minchas Eleiezer	120	96	80%
Yeshiva Kehilath Yaakov	600	510	85%
eshiva Nesivath Olem	140	77	55%
eshiva of Paya	150	135	90%
"eshiva Torah Vodaath	180	63	35%
eshiva Sherath Hapleita	220	154	70%
eth Chana	180	126	79%
A iva Shaar Hatorah	85	77	90%
eshiva Darkei Tshuva	90	72	80%

EXHIBIT "G"

OFFICE OF REIMBURSABLE PROGRAMS

SCHOOL DISTRICT 14, BROOKLYN

310 SOUTH FIRST STREET BROOKLYN, NEW YORK 11211

Continued:

DISTRICT FOURTEEN'S HEBREW DAY SCHOOL LANGUAGE DATA SURVEY

SC.001.	TOTAL ENROLIMENT	TOTAL NON-ENGLISH <u>DOMINANT</u>	PERCENTAGE OF N-E DOMINANT
Yeshiva Shomrei Hadas Dekashoe	210	178	85%
Yeshiva Tzemach David	150	135	90%
Yeshiva Yesoda Hatorah	320	176	55%
Yeshiva Nachlas Yaakov	400	200	50%
Adaas Yeriam	350	140	40%
Yeshiva Ahavas Torah	110	. 88	80%
Beth Rachel	2 025	1,418	70%
United Talmudical Academy	3,055	2,444	80%
TOTALS	11,095	7,890	71%

EXHIBIT "G"

OFFICE OF REIMBURSABLE PROGRAMS

SCHOOL DISTRICT 14, BROOKLYN

310 SOUTH FIRST STREET BROOKLYN, NEW YORK 11211

1.00

DISTRICT 14's NON-PUBLIC SCHOOLS

LANGUAGE DATA SURVEY

SCHOOL	TOTAL ENROLLMENT	NON-ENGLISH DOMINANT	% NON-ENGLISH DOMINANT
All Saints	400	152	38
Saint Alphonsus	265	60	22
Saint Anthony	627	37	5
Saint Cecilia	750	99	13
Saints Cyril and Methodius	314	20	6
Saint Francis of Paola	307	11	3
Immaculate Conception	314	111	35
Most Holy Trinity	366	241	65
Saint Nicholas	278	133	47
Our Lady of Consolation	245	70	28
Our Lady of Mount Carme	377.	333	88
Our Lady of Bedford-			
Stuyvesant W.	562	289	51
Saints Peter and Paul	298	135	46.
Saint Stanislaus	905	289	, 31
Our Saviour	611	423	′ 69
Saint Vincent de Paul	292	88	30
TOTALS	6,911	2,491	36%

DIRECTORY OF NON-PUBLIC SCHOOLS 1973-74

Roman Catholic Schools - Diocese of Brooklyn

SCHOOL	ADDRESS		PRINCIPAL	GRADE	TELEPHONE	
All Saints Elementary	58 Whipple St.,	11206	Sis. Loretta Ferris :	1-8	782-0569	
Immaculate Conception	187 Leonard St.,	11206	Sis. Anne Maureen	1-8	387-6919	
Most Holy Trinity Elementary	140 Montrose Ave.,	11206	Sis. Marjorie Devlin	K-8	384-1101	
Our Lady of Consolation	139 North 1st St.,	11211	Sis. Mary Amandine	1-8	384-3156	
Our Lady of Mt. Carmel	10 Withers St.,	11211	Sis. Mary Sivillo	K-8	387-0079	
Our Lady of Bedford-Stuyvesant W.	이 경찰 시간 물을 받는데 하는데 물을 하는데 가지 않는데 그렇게 되었다면 하는데 하는데 하는데 하는데 하는데 하는데 되었다면 하는데 되었다.	11205	Sis. Elizabeth Folles	1-3	622-1051	
Our Saviour School	250 Hooper St.,	11211	Sis. Filippa	1-8	388-1120	
St. Alphonsus	176 Java St.,	11222	Sis. Agnes M. Barry	1-8	389-3705	
St. Cecilia	1-15 Monitor St.,	11222	Sis. Miriam Daniels	1-8	389-3161 - 38	7-1868
St. Nicholas	287 Powers St.,	11211	Sis. Diane Kirwan	1-8	388-7992	
Sts. Peter and Paul	288 Berry St.,	11211	Sis. Thomasine	1-8	387-1041	
-St. Stanislaus Kosta	10 Newell St.,	11222	Sis. Berchmans	K-8	383-1970	
St. Vincent De Paul	180 North 7th St.,	11211	Sis. Francis Bernadette	K-8	384-3496	
Hebrew Day Schools			(:			
Geoth Roonel		•			`~	
Bais Yaakov Dkhal Adas Yereim	563 Bedford Ave.,	11211	Rabbi Grossman	1-9	782-0569	
Beth Chana	204 Keap St.,	11211	Mrs. Miriam Friedman	1-10	388-5491	
Beth Chana High School	187 Hooper St.,	11211		8-12		
Beth Jacob Elem. School	280 Rodney St.,	11211	Mrs. Yanofsky	K-8		
Beth Jacob High School	143 South 8th St.,	11211	Dr. Yanofsky	9-12	384-1684	
United Talmudical Academy	545 Bedford Ave.,	11211	Rabbi Frankel	K-8		
Yeshiva Ahavas Israel	6 Lee Ave., 6710 Ave	11211	Rabbi Lichtenstien	K-8	388-0848	
Yeshiva Arugath Habosem	171-3 Hooper St.,	11211	Rabbi Rosner	1-11	388-7534	
XYeshiva Jesoda Hatorah	505 Bedford Ave.,	11211	Mr. Isaac Fink	1-8	384-6393	
Yeshiva Kehilath Yakov	638 Bedford Ave.,	11211	Rabbi Eisenberg	1-8	355-8261	:
*Yeshiva Machzekei Torah of Belz	630 Bedford Ave.,	11211	Rabbi Landow	K-9	855-1474	
Yeshiva Torah Vodaath	206 Wilson St.,	11211	Rabbi Cogan	1-8	387-0568	
Ben Yitchor D'Spinka	192 Keapfy		Rable, Ballowitz	K-9	387-4597	
Lutheran Schools	. 1.		,			
St. John the Evangelist	195 Maujer St.,	11206	Mr. David Dobosz	5-8	963-3074	JA
Ukrainian Catholic and All Other	Denominations					18
Holy Ghost Ukrainian Catholic	160 North 5th St.,	11211	Mrs. Lydia Lewyckyj	K-8	782-0664	4
					1	

ST MAKIKS LUTTERAND 6 V 6 BUSHWICK AVE

.....

Affidavit of Rosemary Carroll

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PARENTS COMMITTEE OF P.S. 19,

Plaintiffs, :

-against-

AFFIDAVIT

74 C 783

SCHOOL BOARD, DISTRICT NO. 14, : BOARD OF EDUCATION,

Defendants.

STATE OF NEW YORK) : SS.:

COUNTY OF NEW YORK

ROSEMARY CARROLL, being duly sworn, deposes and says:

- 1. I am an attorney in the office of ADRIAN P.
 BURKE, Corporation Counsel of the City of New York, attorney
 for defendants, and being fully familiar with the facts
 relevant to the instant action, submit this affidavit in
 opposition to plaintiffs' motion for leave to serve a
 supplemental summons and compliant.
- 2. Defendants' opposition to said motion is predicated upon the grounds that (1) it raises entirely new issues of great complexity and difficulty which would unduly delay the termination of this litigation (2) the plaintiffs are guilty of laches in raising these issues at this time (3) there are no events occurring after the institution of this action which can properly be the subject of a supplemental complaint and (4) supplemental complaint on its merits fails to state a claim for relief.

- 3. The Order of this Court dated August 20, 1974 required the parties to agree upon a plan for remedial and compensatory education for the children on split session in Public School 19. The parties have submitted plans, the Chancellor has provided his evaluation. It remains only for the Court to review the plans as submitted.
- 4. It is, thus, inappropriate at this juncture for the Court to grant leave to plaintiffs to raise issues which at best are remotely related to this litigation and are of such complexity that their resolution would unnecessarily prolong this law suit.
- 5. Moreover, a complete adjudication of these issues would require the intervention of all the potentially affected parties, to wit, the non-public school children of District 1..
- 6. Plaintiffs' in delaying presentation of the issues raised in the proposed complaint until the midpoint of the school year are guilty of inexcusable delay. Moreover, this delay has prejudiced defendancs who have expended considerable energy in formulating the 1974-75 Title VII project proposal.
- 7. And, it is clear that since February 1974
 plaintiffs had knowledge of the identity of the intended
 Title VII grant recipients. (See Transcript P. 28 hearing
 October 10, 1974 where plaintiffs' counsel Kimmerling states
 that he requested of Superintendent Rogers that he delay
 the filing of the Title VII grant application).

- 8. There are, thus, no events occurring since the institution of this law suit which can properly be the subject of the supplemental complaint. The critical fact of selection of the proposed recipients of Title VII services occurred in February 1974 and was known to plaintiffs at that time.
- 9. In exercising its discretion with respect to the plaintiffs' motion, it is appropriate for the Court to consider the merits of plaintiffs' proposed complaint.
- 10. The complaint fails to state a claim for relief upon Pirst Amendment grounds since the inclusion of a comparability requirement in federal aid to education statutes has been upheld where that aid is directed to eligible children. See Wheeler v. Barrera, U.S.,
- 11. The complaint fails to demonstrate that the Title VII project for District 14 violates the comparability requirement of Title VII (20 USC §8806-3b (3)B) or the regulations promulgated thereunder (45 C R 123.5h).
- 12. A review of the five-year Title VII project for District 14 indicates that 1970-1975 approximately 732,000 was allocated for the public school children of District 14 whereas approximately \$330,000 was allocated for the non-public school children. (See Speigel affidavit p. 28)
- 13. Considering the number of Title VII eligible children in the non-public schools in the District it is clear that this allocation is entirely lawful and proper.

- 14. Title VII is intended to promote the development of new and imaginative Bi-lingual Projects for instruction of English language handicapped children.
- additional Title VII funds to be allocated to P.S.19 upon this Court's order it is doubtful that P.S. 19 would be an appropriate site for the development of a Model Bilingual reject while it continues on split session. It was for this reason that the Office of Bilingual Education and the District concluded that P.S. 19 would be an educationally unsound choice for designation as a pilot school under the Aspira consent decree.
- 16. In conclusion, the motion should be denied upon the grounds that it is dilatory, will serve only to unnecessarily extend this law suit by introducing complex and difficult issues which are more properly the subject of a separate law suit, and most importantly, because the complaint on its merits fails to state a claim upon which relief may be granted.

POSEMARY CARROLL

100

F 45

Sworn to before me this

4th day of December, 1974.

Commissioner of Deede City of May York

Cert. filed 1 1 . York County

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL #19, et al.,

Plaintiffs.

74 Civ. 783

JBW

-against-

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT #14 OF THE CITY OF NEW YORK, et al.,

ORDER

Defendants.

This cause came on to be heard on plaintiffs' motion for leave to file a supplemental complaint and to serve a supplemental summons herein, and the court being fully advised,

IT IS ORDERED (1) That plaintiffs be given leave to file their supplemental complaint; and

- (2) That plaintiffs be given leave to serve a supplemental summons on Terrel H. Bell, Commissioner of the United States Office of Education; and
- (3) That the defendants Community School Board No. 14 and the members thereof; William A. Rogers; Irving Anker; and the Board of Education and the members thereof answer or move with respect to the supplemental complaint within 60 days after service thereof.

DATED: Deccaher // , 1974
Brooklyn, New York.

JACK B. WEINSTEIN, United States District Judge SCHIA ACOSTA, individually and on benalf of ner minor child PAVID, SUPPLEMENTAL COMPLAINT OF AS

NOFWA ALWARADO, individually and : ACTION on behalf of her minor children ELIZABETH, JERMY, OLGA and IRIG, : 74 CIV. 783

MARIA CABRERA, individually and on cohalf of her minor child WARE, DA CHI ABERT,

MIGUELEFIA CONTENC, individually and on behalf of her minor children JOHNNY and RUBEN,

NEARIDA COLON, individually and on tehalf of her minor children DAINY and RETNALDO,

MARIA ESTERES, individually and on behalf of her minor child MARIBOL,

ANA LOPEZ, individually and on benefit of her minor children FELE and ANA,

PART WILDONADO, individually and on thirth of her misor of larer titresis and PADDINE,

MARIN PARCHEZ, inclviduable and on becalf of her miner chila Carrier,

DAILT MODIE, individually and on total of her minor child DAISY,

(continued next page)

: J.B.W.

LYPIA OTERO, individually and on behalf of her minor children ERIC and MERVIN,

ROCA PAGAN, Individually and on behalf of her minor children DINO, RAMON and WANDA,

GEORGINA FEREZ, individually and on behalf of her minor child LUZ ENEIDA WOLLNA,

AMA RAMOS, individually and on behalf of her minor children MARIA ROMBON and LUZ ROMBON,

MANUELA RAMOS, individually and on behalf of her minor child RICHARD,

NATIVIDAD RESTO, individually and on behalf of her minor children WANDA RIVERA and LYDIA RESTO,

AURORA RIVERA, individually and on behalf of her minor children DORIS and JIMMY,

MERCEDES RIVERA, individually and on behalf of her minor children JACQUELINE, CARMELO and RAFAEL,

CARVEN ROOR ONEZ, individually and on behalf of her minor children EFRAIN and HAYRA,

REINA RODRICUEZ, individually and on tehnif of her minor children LORLA and JOSE NUMEZ,

SIRAH RODELGUEZ, individually and on behalf of her minor child LIZZETTE,

VICTURIA HODRIGUEZ, individually and on behalf of her minor children DIANE and CHARLES,

CARREL SANFFAGO, individually and on behalf of her minor child LIZETTE,

EIRIAM SULSEMA, individually and on behalf of her minor child SHIRWAY HORALES,

ANTOLINA TRINIDAD, individually and on tehalf of her minor children LUIS and MARIA,

CALDIDA VASQUEZ, Individually and on behalf or her almor children WILVA, ADALEMA, BENITO and JAMEN, and all others similarly situated,

Plaintiffs,

THE COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT NO. 14 OF THE CITY OF NEW YORK,

PROTHER EQUEET F. LALLY,
WHOMAS STRUBBERGER, ANGEL L. REYFS,
PAREL LECPOLD LEYKOWITZ, JOSEPH POHOMO
PETER DELLATACONO, LEROY FREDERICAS,
RCHAN A. RIZGALSKI and LUISA RIVERA,
individually and in their official
capacity as members of the Community
School Board of Community School
District No. 14 of the City of
"ew York,

WILLIAM ROCERS, individually and in his official capacity as Community Echool District Superintendent of Community School District No. 14,

THE BOARD OF EDUCATION OF THE CLASS OF NEW YORK,

IA ASHE, JOSEPH MONSERRAT,

H. E. HOPINSON, JR., JAMES F. REGAN,

CH. G. BARKAN, STEPHEN R. AIELLO,

ROBERT CHRISTEN individually and

In their official capacity as members

of the Board of Education of the City

of New York,

IRVING ANKER, individually and in his official capacity as Chancellor of the City School District of the City of New York,

SUFFURNISHED COMPLAINT

TERRELL SELL, individually and in his secity as Commissioner of the Unit States Office of Education of the Dept ment of Health, Education and : Welfare,

Defendants.

JURISDICTION

ORIGINAL COMPLAINT

- on behalf of their minor children, students at Public School 19, who effectively receive one day per week less educational instruction than other children in the New York City public elementary schools die to the deferdants' continued and systematic maintenance of spaces according discriminated against under color of law on the tasis of race, color and national origin in violation of the First and Fourteenth Amendments to the United States Constitution. Title VI of the Civil Rights Act of 1964, 42 U.S.C. §20.7d and and #2 U.S.C. §1983, and seek declaratory and injunctive relief to redress the deprivation of their right to an equal educational opportunity.
 - 2. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. \$1343 (3) and (4). Declaratory relief is appropriate pursuant to 28 U.S.C. \$\$2201 and 2202:

SUPPLEMENTAL CONTAINT

3. This action for declarator, and injunctive relief is also brought by Puerto Rican and other Hispanic parents on benalf of their minor children, eligible for and in need of special bilingual education programs under Title VII of the Diementary and and Secondary Education Act of 1965, as amended, who contest the application for and grant of federal funds for the operation of special bilingual education programs which service parachial school children to a disproportionately greater extent than children enrolled in the polic schools of District No. 14. This

grant is in violation of the First Amendment to the United States Constitution, the Bilingual Education Act (Title VII of the Elementary and Secondary Education Act of 1965, as amended), 20 U.S.C. \$880b, and the regulations promulgated thereunder (45 C.F. R. \$123).

4. The jurisdiction of this Court is also invoked pursuant to 28 U.S.C. \$\$1331 and 1351. Declaratory relief is appropriate pursuant to 28 U.S.C. \$\$2201 and 2202. The matter in controversy exceeds \$10,000, exclusive of interest and costs.

II

PARTIES

ORIGINAL COMPLAINT

- association of Puerto Rican parents whose children attend Public School 19. The PARENTS' COMMITTEE OF PUBLIC SCHOOL 19 seeks to assure equality of educational opportunity for Hispanic children in Public School 19 and Community School District No. 14 and to combat discrimination on the basis of race, color and national origin.
- 6. Plaintiffs "A DECOS and her minor child, ALEXANDER, age 5, are Fuerto Rican ed reside at 332 Heap Street, Brooklyn, New York. ALEXANDER attends kindergarten at Public School 19.
- 7. Plaintiffs MARIA GARCIA and her minor children SYLVIA, JOSE, LUIS and MATILDE, ages 5, 7, 8 and 9, Puerto Rican and reside at 376 Hooper Street, Brooklyn, New York. SYLVIA, JOSE, LUIS and MATILDE attend kindergerten, first, second and third grades respectively at Public School 19.
- 8. Plaintiffs ANA PEREZ and her minor child ANNETTE CORTED, age 10, are Duerto Rican and reside at 279 South First Storet,

JA 195 procklyn. Now York. ANNETTE attends and is repeating the fourth grade at Fullie School 19. 9. Plaintiffs ROSA RYRTAS and her minor children, JOSE MUNEUT, RADUL VEGA, and SADA VEGA, ages 7, 8 and 11 respectively. are Fuerte Ricen and reside at 305 South Fourth Street, brookings, New York. JOSE, NALON and MARK, attend the first, second and fourth grades, respectavely, at Public School 19. JOSE had to repeat the first grade. 10. Plaintiffs CON. ACCOVA and her minor child DAVID, age 6, are Puerco Rican and reside at 374 South Second Street. Brooklyn, Mew York. David attenus kindergarten at Public School 19. 1). Plaintiffs NORMA ALVARADO and her minor children ELIZAPETH, JENNY, OLGA and IRIS, ages 6, 7, 8, 5 and a ively, are Puerto Fican and reside at 353 South 5th Street, Brocklyn, New York. ELIZABLTH, JEHNY, OLDA and TRIS attend kindergarten, first; third and Fourth grades, respectively, at Public School 19. 12. Flaintiffs WARIA CABRERA and her miner child WARESON CELABERT, age 5, are Puerto Rican and reside at 324 South Fourth Street, Brooklyn, New York. WAKESCA attends kindergarten at Public School 19. 13. Plaintiffs MIGUELERIA CENTENO and her minor children JOHNNY and AUREN, ages 10 and 13 respectively, are Puerto Rican and reside at 294 Union Avenue, Brooklyn, New York. JOHNNY attends third grade at Public School 19. RUBEN attends and is repeating sixth grade at Public School 17. 14. Plaintiffs NEREIDA COLON and her minor children DAWNY and REYNALDO, ages 6 and 7 respectively, are Puerto Rican and reside at 350 Keap Street, Brooklyn, New York. DAKNY and REYNALL attend kindergarten and second grade, respectively, at Public School 19.

- 15. Plaintiffs WARIA ESTERES and her stnor child WARIBEL, age 5, are Puerro Rican and reside at 364 Hooper Street, Eccoklyn. New York. PARIEE attends kindergarten at Public School 19.
- 16. Plaintiffs and LOPER and her winer children HENE and ANA, ages 7 and 12 respectively, are Puerto Rican and reside at 344 South Fourth Street, Brooklyn, New York. RENE and ANA attend the first and fifth grades, respectively, at Public School 19.
- 17. Plaintiffs MARY MALDONADO and her minor children, LISSETTE and MADLINE, ages 6 and 7, respectively, are Puerto Fical and reside at 378 Hooper Street, Brooklyn, New York. LISSETTE and MADLINE attend kindergarten and first grade, respectively, at Public School 19.
- 18. Plaintiffs MARIA MARQUEZ and her minor child CARMEN, age 6, are Poerto Rican and reside at 346 South Third Street, Brooklyn, New York. CARMEN attends the first grade at Public School 19.
- 19. Plaintiffs DAISY MUNIC and her minor child DAISY, age 6, are Fuerto Rican and reside at 316 South Pirst Street, Brooklyn, New York. DAISY attends the first grade at Public School 19.
- 20. Plaintiffs LYDIA OTERO and her minor children, ERIC and MERVIN, ages 8 and 11 respectively, are Poerto Rican and reside at 415 South 4th Street, Brooklyn, New York. ERIC and MERVIN attend the third and fifth grades, respectively, at Public School 19.
- 21. Plaintiffs ROSA PAGAN and her minor children, DINO, RAMON and WANDA, ages 8, 10 and 11, respectively, are Puerto Rican and reside at 368 South 3rd Street, Brocklyn, New York. DINO, RAMON and WANDA attend the third, fourth and fifth grades, respectively, at Public School 19.

22. Plaintiffs OEORGINA PEREZ and her minor child LUZ ERLID: MOLINA, age 5, are Puerto Rican and reside at 322 Rodney Street, LUZ ENEIDA attends kingergarten at Public School 19.

Figure ..

- 23. Plaintiffs ANA RABOS and her minor children, MARIA
 ROBDON and AUZ RONDON, ages 5 and 6 respectively, are Fuerto
 Rican and reside at 262 South 1st Street, Brooklyn, New York.
 MARIA and LUZ attend kindergarten and first grade, respectively,
 as Public School 19.
- 24. Plaintiffs MANUELA RAMOS and her minor child, RICHARD, age 6, are Puerto Rican and reside at 374 South 2nd Street, Brooklyn, New York. RICHARD ettends first grade at Public School 19.
- 25. Plaintiffs NATIVIDAD RESTO and her minor children, WANDA RIVERA and LYDIA, ages 5 and 12 respectively, are Pierto Rican and reside at 359 South 2nd Street, Brooklyn, New York. WANDA and LYDIA attend kindergarten and fifth grade, respectively at Public School 19.
- 26. Plaintiffs AURORA RIVERA and her minor children, DORIS and JIMMY, ages 6 and 11 respectively, are Puerto Rican and reside at 340 South 3rd Street. DORIS and JIMMY attend the first and fifth grades, respectively, at Public School 19.
- 27. Plaintiffs MERCEDES RIVERA and her minor children JACQUELINE, CARMELO and RAFAEL, ages 6, 8, and 9 respectively, are Puerto Rican and reside at 340 South 3rd Street, Brooklyn, New York. JACQUELINE, CARMELO and RAFAEL attend kindergarten, second and third grades, respectively, at Public School 19.
- 28. Plaintiffs CARMEN RODRIGUEZ and her minor children EFRAIN and MAYRA, ages 7 and 11 respectively, are Puerto Rican and reside at 380 Hooper Street, Brooklyn, New York. EFRAIN and MAYRA attend first and fifth grades, respectively, at Public School 19.

- 29. Plaintiffs REINA RODRIGUEZ and her minor children LOILA and JOSE NUMEZ, age 9 and 10 respectively, are Puerto Rican and reside at 381 Hooper Street, Brooklyn, New York. LOILA and JOSE attend the second and third grades, respectively, at Public School 19.
- 30. Plaintiffs SARAH HODRIGUEZ and her minor child, LIZZETTE, age 6, are Puecto Rican and reside at 415 Grand Street, Brooklyn, New York. LIZZETTE attends kindergarten at Public School 19.
- 31. Plaintiffs VICTORIA RODRICUEZ and her minor children
 DIANE and CHARLES, ages 5 and 6 respectively, are Puerto Rican and
 reside at 322 Rodney Street, Brooklyn, New York. DIANE and
 CMAPLES attend kindergarten and first grade at Public School 19.
- 32. Plaintiffs CARMEN SANTIAGO and her minor child, LIZETTE, age 5, are Puerto Rican and reside at 331 Keap Street Brooklyn, ... New York. LIZETTE attends kindergarten at Fublic School 19.
- 33. Plaintiffs MIRIAM SULSONA and her minor child SHIRLEY MORALES, age 5 are Fuerto Rican and reside at 272 South 5th Street, Brooklyn, New York. SHIRLEY attends kindergarten at Public School 19.
- 34. Flaintiffs ANTOLINA TRINIDAD and her minor children LUIS and MARIA, ages 6 and 10 respectively, are Puerto Rican and reside at 465 Grand Street, Brooklyn, New York. LUIS and MARIA attend the first and fifth grades, respectively, at Public School 19.
- 35. Plaintiffs CANDIDA VASQUEZ and her minor children WILMA ADALENA, BENITO and JANET, ages 5, 9, 11 and 12 respectively, are Puerto Rican and reside at 353 South 5th Street, Brooklyn, New York. WILMA and ADALENA attend kindergarten and the fourth grade respectively, at Public School 19. BENITO and JANET attend the sixth grade at Putlic School 17. JANET had to repeat the fourth grade.

- No. 14 of the CITY OF NEW YORK and, its members PROTHER HOBERT F.
 LALLY, THOWAS STROMMENGER, MIGED L. HEYES, RABBI LEOPOLD LEFRONT.
 JOSEPH BONOVO, PETER DUMLALACONO, LEMOY FREDERICKS, ROMAN A.
 MIZGALSKI, LUISA RIVERA, who are sued individually and in their
 official capacity as members of the school board of Community
 School District No. 14, share responsibility for the administration and operation of public elementary schools (New York State
 Education Law \$2590-e) within the Williamsburg-Greenpoint Section
- 37. Defendant WILLIAM ROCERS, who is sued individually and in his official capacity as the Community School District Super-Intendent of Community School District No. 14, shares the responsibility for the administration and operation of the public elementary schools within District No. 14 (New York State Education Law §2590-f):
 - 38. Defendants THE BOARD OF EDUCATION OF THE CITY OF NEW YORK and its members AMELIA ASHE, JOSEPH MINSERRAT, ISAIAH E. ROBINSON, JR., JAMES REGAN, JOSEPH G. BARKAN, STEPHEN R. AIELLO, and ROBERT CHRISTEN, who are sued individually and in their official capacity as members of the Board of Education of the City of New York, share responsibility for the operation and administration of public elementary schools in New York City and have the specific enumerated duty to approve curriculum requirements of elementary schools (New York State Education Law \$2590-g).
 - 39. Defendant TRVING ANKER, who is mied individually and in his official capacity as chancellor of the New York City.

 School district shares responsibility for the operation and admi-

nistration of public elementary schools and has the specific enumerated power of promulgating and approving minimum educational standards and curriculum requirements. (New York State Education Law \$2500-b.)

SUPPLEMENTAL COMPLATION

- 40. Defendants Community School Ecard No. 14, an applicant No. 16 all educational agency under the Billingual Education Act, and Defendant Rogers have applied for and received financial assistance under Title VII to carry out programs to meet the special educational needs of children of limited English-speaking ability residing in Community School District No. 14.
- Wi. Defendants Epard of Education and Chancellor Anker are responsible for custody and disbursement of all funds expended for educational programs by the Community School Boards in the City of New York.
- 42. Defendant Bell, who is sued individually and in his official capacity as Commissioner of the United States Office of Education, is responsible for the administration of grants of federal funds to local educational agencies to operate special educational programs for children of limited English-speaking ability (20 U.S.C. §880b).

III

CLASS ACTION ALLEGATIONS

ORIGINAL COMPLAINT

#3. Plaintiffs bring this action pursuant to Rules 23 (a) and (b)(2) of the Federal Rules of Civil Procedure on behalf of themselves and all other persons similarly situated. The class

consists of Fuerto Rican and other Elepanic (hereinafter the term Puerto Rican small include Hispanic) parents and their minor children who are, will be or have been on split-session classes at Fublic Central 19 and as a result are, will be or have been deprived of an equal educational opportunity on the basis of race, color and national origin.

- 44. The class is so numerous that joinder of all marbers is impracticable. It is impossible to specify the exact number of persons in the class as a whole, but for the 1973-1974 sencel year over fourteen bundres (1400) children were enrolled in the elementary school attenting kindsmarten through fifth grade.
- 45. The plant office will fairly and adequately represent the interests of the soft in this action for declaratory and injunctive relief. Each cont, suing individually and on behalf of their minor child soft, has a child or children attending Public School 19 who is effectively receiving, or will effectively receive or has effectively received one day less per week of educational instruction than children at other public elementary school due to defendants continued and systematic maintenance of split-session classes. The plaintiffs' claims are typical of the claim of the other members of the class. The defendants have acted or refused to act on grounds generally applicable to the class thereby making appropriate final declaratory and injunctive relief.
- 46. The questions of law and fact common to the class include the following:
- A. Whether defendants' continued and systematic maintenance of split-session classes effectively resulting in one day per week less educational instruction at Public School 19, than at other public elementary schools, without any state justification for said deprivation, discriminates against plaintiffs' class on the basis of race, color and national origin in

violation of the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution, Fittle VI of the Civil Rights Act of 1964, 42 U.S.C. Idebion 20003, and 42 U.S.C. Section 1963?

- classes effectively resulting in one day per week less educational instruction at Fublic Subsol 19 with an enrollment of many Public Rican children with English language disabilities, deprives plaintiffs and their class of the full enjoyment of the rights secured by the First and Fourteenth Amendments to the United States Constitution?
- C. What relief is appropriate to redress the violations of rights secured to plaintiffs and the class they represent under the Constitution and the laws of the United States?

SUPPLEMENTAL COMPLAINT

- 47. The class consists of Puerto Rican and other Hispanic parents and their minor children who are of limited English-spenking ability who are not receiving special bilingual clucation programs and who are enrolled in schools of a local educational agency receiving federal funds to provide such programs.
- 48. The plaintiffs will fairly and adequately represent the interests of the class in this action for declaratory and injunctive relief. Each parent suing individually and on behalf of their minor children, has a child of limited English-speaking ability who, although enrolled in a school operated by an educational agency receiving federal funds to provide such progress, I not receiving such progress due to defendants' provision of such services to a disproportionately greater extent to children enrolled in parachial schools not operated by defendants. The

JA 203

plaintiffs' claims are typical of the claims of the other members of the class. The defendance have acted or refused to act on granula generally applicable to the class thereby making appropriate final declaratory and injunctive relief.

- include the following:
- A. Whether defendants' provision of bilingual education, recreams to children enrolled in parochial schools to a discontinuately greater extent than to children of limited English-speaking ability enrolled in public schools violates that VII of the Elementary and Secondary Education Act of 1965, as sended and regulations promulgated thereunder?
- B. Whether defendants' expenditure of a greater amount of stands for services to parochial school children, both absolutely at in relation to the eligible parochial school population,
 that expenditure for public school children establishes a bilintual education program in parochial schools on a greater scale
 that existing in public schools in violation of the First
 Amorticent to the United States Constitution?

STATEMENT OF CLAIM

ORIGINAL COMPLATION . .

- Kear, Rodney and South Third Streets, is one of twenty one (21) electrical which comprise Cormunity School District No. 1 in the Williamsburg-Greenpoint section of Brooklyn.
- is a reximately eleven hundred (1100) children. Fublic School 19:18 a 1973-74 school year enrollment of over fourteen.
 Lin Ld (1400) children in classes kindergarten to the fifth

JA 204

- which is composed of over ninety-five percent (957) Puerto Rican children. This is the greatest concentration of Puerto Rican students in percentage terms and absolute numbers of any of the public elementary schools in Community School District No. 14, and in percentage terms, in the entire New York City School District encompassing all thirty two (32) community school districts.
- 53. For many years Public School 19 has exhibited a pattern of racial and ethnic imbalance and has consistently maintained an enrollment which is predominantly Puerto Rican.
- 54. Overutilization of Public School 19 has been a persistent problem for the past fifteen years. Since the 1961-1962 school year, classes in the first, second and third grades have been forced to attend split-session classes.
- 55. For the 1973-1974 school year, first, second and third grades except for four third grade classes continue to operate on split sessions. There are eleven first grade classes, nine second grade classes and ten third grade classes with approximately twenty-five children in each class.
- 56. Split-session cl. as incorporate a morning session from 7:45 A.E. to 12:00 P.M. and in afternoon session from 12:00 P.M. to 4:00 P.M. Fourth and fifth grade classes at Public School 19 attend a full day, 8:45 A.M. to 3:00 P.M., which is the normal schedule for full time students in the New York City School District.
- 57. Thus, split-session classes limit plaintiffs to only
 4 (four) hours of daily educational instruction as opposed to the
 5 (five) hours of instruction received by other elementary school

students. The effect of defendants' practice is to cause plaintiffs to receive one day leas per week educational instruction than that received by other public elementary school students.

- 58. The defendant Board of Education has equired classes receiving less than 5 (five) daily hours of education to receive special approval from the defendant Anker or defendant Rogers (EYC Board of Education Speliams \$77[2]).
- arbitrary and discriminatory manner. Public School 19 is the only school in District 14 on split-session classes, and it has been on split-session classes for the past 12 years. Moreover, plaintiffs know of no other school in recent history that has been on split sessions for as long a period as Public School 15.
- 60. This longstanding discrimination against Public Candel

 19 is part of a larger pattern and practice of discrimination by
 the efendants. Puerto Rican Students comprise approximately

 267 the New York City School district student population. Cn

 Information and belief, there are only seven other public
 cleantary schools presently operating with split-session classes.

 Compared to the percentage of Puerto Rican students city-wide,
 those seven schools have a disproportionate number of Fuerto

 Rican students:

District No. 15	Puerto Rican
P.S. 94	62.43
P.S. 124	70.75
District No. 32	
P.S. 75	69.95
P.S. 86	28.55
P.S. 106	69.15
P.S. 116	78.95
P.S. 151	62.65

61. The loss of educational opportunity as a result of applit sessions is clear. A report issued by New York State Education Department in 1961 entitled "Objectives of Elementary Education, The 3R's and Much More" indicated that:

Length of School Day

Reductions in the length of the school day represent a serious threat to the future of children and their society. This threat is particularly significant in consideration of the increased educational demands which modern life increases on these who live in a democratic society.

It is incumbent on school officials to maintain a daily school schedule which permits adequate time for each child to have the best educational experience. Paily schedules for the elementary schools of New York State should be maintained for at least the minimum hours listed below:

Kindergarten .

All day Half-day 5 Hours 2 1/2 Hours

Grades 1 thru 6

5 Hours

- 62. Of the seven areas of curriculum required by defendant Board of Education as a basic minimum, the effective loss of the day per week results in a limited opportunity to acquire skills in language arts and mathematics, and, on information and belief, little or no opportunity to acquire skills in social studies, science and health, arts and crafts, and physical activities.
- 63. The limited programming is particularly egregious for according to the latest Board of Education statistics, in 1970, 55 percent of the students at Public School 19 were categorized as having moderate or severe English language difficulty.
- 64. The impact of the split-session classes can be seen in the results of the Metropolitan Achievement Tests (MAT's) administered by the defendant Board of Education. Students at Public School 19 have scored among the poorest in Community

Ho. 14 and in the Lew York City School District. The 1972 reading achievement thats indicated that only 14.3% of the students attending function Denoel 19 read at or above grade level. The 1973 reading nemicroscopy tests indicated that the median score for fifth grade students was one and a half years behind the national median. On information and belief, these differences between the reading levels of plaintiffs who have attended split-scasion clarges and students attending full time increases with each year of education.

- 65. But even the HAT scores are not sufficient measure of the inadequate education suffered by the plaintiffs. The HAT's are not given to those students who have very severe language difficulties. On information and belief this is approximately 10% of the students at fublic School 19. Moreover, the MAT's only measure the level of reading and do not measure speaking ability of eral comprehension of English or any of the other 5 critical corriculum areas. (See paragraph 62.)
- 66. On information and belief, defendants' maintenance of split-session classes which fail to provide plaintiffs with an equal educational opportunity inevitably results in higher truence and drop-out rates and underrepresentation in academic high schools graduation and eventually college study.
- forminate the continued maintenance of split-session classes have been de minimus. During the 1964-105 school year, defendant Board of Education constructed eleven pre-fabricated classrooms so that the fourth grade, which had been operating on split session the previous year, could attend on a full time basis. The first, second and third grades continued to attend split-session classes.

- transfer at no effect on defendants' continued man connect of split-reason classes for the first, second and third grades at Putlic Devot 19, for it coincided with the demolities of the above-reasoned pre-fabricated classrooms. Moreover this transfer has the effect of further disrupting plaintiffs' contained process, lince plaintiffs attend Public School 17 for any one year telera being transferred again to a Junior High Tabbool.
- Board of Education and Community School Board of District No. 14 have sought and received appropriations from the capital budget of the City of New York for the construction of public elementary schools, referdants have sought no appropriations to elleviate the overutilization and split-session classes at Public Londol 19 so that plaintiffs could be provided with an equal educational opportunity.

SUPPLEMENTAL COMPLAINT

- 75. Defendant Community School Board No. 14 has been grante funds by the United States Office of Education under Title VII of the Elementary and Secondary Education Act of 1965, as amended, (hereinafter "Title VII") to operate Spanish English villingual education programs for children of limited English-speaking ebility residing in the district since the 1969-70 school year.
- 71. In the 1973-74 school year, Defendant Community School Board No. 14 received \$128,765 under Title VII for the fourth year of the recycled program to provide services to approximately 300 children enrolled in P.S. 122.
- 72. On February 25, 1974, defendant Community Thool Board No. 14, by defendants Rogers and Lally, submitted at application

to the United States Office of Education for Title VII fynds for the 1974-75 school year. The Application requested a total of \$971,710 for two components: a Spanish-English program and s Yiddish-English program.

73. The first component of the proposal requested \$313,231 for a Spanish-English program, a recycling of the previous 4 year program, to service 328 children enrolled at 7.5. 122, and to service for the first time 367 children enrolled in non-public schools: 67 children enrolled in Sts. Peter & Paul School and 300 children enrolled in Our Saviour School. The assessment of the number of children of limited English speaking ability enrolled in the applicant's public schools was 17,000. Thus funds were requested to service approximately 1.95 of needy public school children. There was no assessment of the total number of such children enrolled in non-public schools in Community School District No. 14.

74. The second component of the proposal requested \$558,475 for a Yiddish-English program to service 760 children enrolled in parochial schools in District No. 14: 360 enrolled in the United Talsudical Academy, and 400 enrolled in the Deth Machel School for Cirls. This component had no assessment of the total number of children of limited English-speaking ability enrolled in non-public schools in Community School District No. 14.

75. The first component application stated that the "C.S.D.
#14 Advisory Committee" had approved the component on February 13.
1974. No list of the names and addresses of the members of the
"C.S.D. #14 Advisory Committee" and no documentation of the date
the application had been submitted to such a group for study, or
of such a group's comments and recommendations, was attacked.

76. The second component application stated that the Community School District No.1/4 "Don-Public Advisory Committee" had approved the proposal. No dominant was listed for such approved.

No list of names and addresses of the members of the Community

School District No.14 "Non-Public Advisory Committee" was appended.

No decomentation of the date the application had been submitted

to the "Non-Public Advisory Committee" for study or of such

group's comments and recommendations was attached. A list of

members of a "Community Advisory Board," all members of which were

listed as parents of proposed participants only in the Yiddish
English program, was attached.

- 77. On information and belief, no single community advisory group, composed 50% of parents of all children affected by the complete proposed program and other persons representative of all regments of the population to be served by the proposed program, either received for study prior to submission or approved the Title VII proposal in February, 1974 or at any time thereafter.
- 78. On June 26, 1974, defendent Bell approved a grant of \$467,231 to defendant Community School District No.14 to provide bilingual ejucation programs to service 1,116 enildren: 348 children enrolled in P.S. 122, and 768 children enrolled in parechial schools in District No.14.
- Community School Board No.14 was held at P.S. 132 in District
 No. 14 at 7:30 P.M. On the agenda was a resolution that the
 Board approve the acceptance of a grant of \$467,231 for the
 Title VII program. Some members of the Board stated that they
 had never seen either component of the proposal before the meeting. On information and belief, questions were raised by wembers
 of the public audience and community school board members concerning the substance of the parachial school component of the Title
 VII program, but such questions were ruled out of order by
 defendant bally. Then brought to a vote, the resolution failed.

80. On September 6, 1974, a "Special Fublic Meeting" or defendant Community School Found No. 14 was held at I.S. 49 on District No. 14 at 3:30 P.M. A single resolution that defendant Community Doard accept "a fittle VII grant in the amount of \$\\$67,231.00 to implement the Dilingual Early Childhood Conter Program in District 14 for Public and Non-Public Schools" was introduced. The minutes of defendant Community School Found show that discussion followed during which "it was explained that the \$\\$010wing non-public schools would share part of the Title VII Funds:

Our Saviour
Sts. Peter and Paul
Beth Racne!
United Talrudical Academy."

The resolution was approved unanimously and the meeting was adjourned at 3:45 P.K.

- 31. On September 12, 1974, defendant Community School Board No. 14 informed defendant Board of Education of the Item; ed Project Cost of the Title VII grant. Of the total grant of \$436,231, personnel positions accounted for \$406,037, including:
 - 1 Coordinating Teacher,

1,12

411

- 2 Curriculum (C.C.) Teachers,
- 2 English as a Second Language (E.C.L.) Teachers,
- 2 Spanish as a Second Language (S.s.L.) Teachers,
- 1 Yiddish as a Second Language (a J.L.) Teacher,
- 40 Educational Assistants/Teachers' Aldes (E.A./T.A.)
- 4 Family Assistant/Workers (F.A./R.W.).

Other-than-personnel-services accounted for \$51,837 (Exhibit 1).

82. In October, 1974, defendant Board of Education requests, and received from defendant Community School Board No. 14 an assignment schedule, by site, of Title VII personnel. (Exhibit 2.)
The following table, based upon defendant School Board's sut-

JA 212

mission, reveals the disproportionate allocation of services:

	TEACHER FOSITIONS/DAYS OF SERVICES							
PUBLIC . 2.3, 122	E.S.L.	S.S.L. 5	c.c. 4	Y.S.T.	TOTAL 13			
PARDCHIAL Our Saviour	2	3	2		7			
. Sto. Peter and 7 Paul	1	2	2	-	- 5			
Feth Rachel School for Giels	2		2	3	7			
' United Talmudical Academy	1	_		2	3			
	•							

	PARAPROFE	ESSIONAL POSTTI	ons
PUBLIC P.S. 182	E.A./T.A.	F.W./F.A.	TOTAL 11

PAROCHIAL Our Saviour	8	1	9
Sts. Peter and Paul	5	1/2	2 1/2
*Beth Rachel School for Girls	15	1	16
United Talmudical Academy	5	1/2	5 1/2

83. On information and belief, defendant Board of Education has directed the Comptroller of the City of New York to disburse funds, which it had accepted from defendant Bell, to defendant Community School Board No. 14 to expend to meet the cost of operation of the Title VII program in District No. 14.

84. On information and belief, there has been no monthly public meeting of a Community Advisory Committee composed of 50% of parents of children directly affected by the program and other persons representative of the population served, such as members of civic and community organizations, to discuss policy matters arising in the operation of the Title VII program.

V

CLAIMS FOR PELLEF

ORIGINAL COMPLAINT

FIRST CLAIM FOR RELIEF

85. Defendants' continued and systematic maintenance of split-dession classes at Public School 19 violates plaintiffs' right to an equal educational opportunity on the basis of race, color and national or jin in violation of the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution and 42 U.S.C. §1983.

SECOND CLAIM FOR RELIEF

- 86. Plaintiffs repeat and reallege paragraph 1 through 69 as if such paragraphs were more fully alleged herein.
- 87. The public school system of the City of New York receives over \$100 million annually in financial assistance from the United States government. Title VI of the Civil Rights Act of 1964 prohibits the denial of equal educational opportunities to the plaintiffs on the grounds of their race, color or national origin by the recipients of Federal financial assistance.

88. Defendants' continued and systematic maintenance of split-session chasses at Public School 19 violates plaintiffs right to an equal educational opportunity on the basis of race, color and national origin in violation of Title VI of the Civil Rights Act of 1964, 42 U.S.C. \$2000d and the regulations and guidelines promulgated thereunder and the Fourteenth Amendment to the United States Constitution.

THIRD CLAIM FOR RELIEF

- 89. Plaintiffs repeat and reallege paragraphs 1 through 61 as if such paragraphs were more fully alleged herein.
- 90. Defendants' maintenance of split-session lasses fails to provide plaintiffs with an adequate amount of simulational instruction to obtain basic minimal skills depriving plaintiffs of the full enjoyment of the rights secured by the First and Fourteenth Amendments to the United States Constitution.

SUPPLEMENTAL COMPLAINT

FOURTH CLAIM FOR RELIEF

- 91. Flaintiffs repeat and reallege paragraphs 70 through 84 as if such paragraphs were more fully alleged herein.
- 92. Defendants have approved, granted and distursed federal funds for special bilingual education programs which service children enrolled in parochial schools to a disproportionately greater extent than children enrolled in public schools in Distriction 14.
- 93. Fille VII of the Flementary and Secondary Education Act of 1965, as amended (Bilingual Education Act), mandates that

JA 215

programs established mover the Act be approved only if the commissioner of Fluedtion ditermines that prevision has been used for participation of parachial school children:

...to the extent consistent with the number of entire enterolled in non-profit private achoes in the area to be screen whose educational needs are of the type which this program is intended to meet.... 20 U.S.C. §8865-3 (b)(3)(b).

The regulations premigated by the Commissioner of the Office of Education pursuant to this provision of the Act provide that:

Participation of children enrolled in private schools.

Applications submitted under this part shall contain an assurance that, to the extent consistent with the number of children of limited English-speaking ability enrolled in nonprofit private schools in the area to be served, provision has been made for participation of such children in the proposed program, and a description of the provisions which have been made for such participation. Such provisions shall assure that the special educational needs of such children are addressed to the same extent as the special educational needs of children of limited English-speaking ability enrolled in the schools of the applicant local educational agency. 45 C.F.R. §123.14(a) (39 Fed. heg. 17968, May 22, 1974).

These regulations also provide that:

Except as provided in §123.15, activities assisted under this part shall be designed primarily to meet the special educational needs of children enrolled in schools operated by the applicant local educational agency. 45 C.F.R. §123.12(c) (39 Fed. Rog. 17966).

94. Defendants' approval, grant, and disbursament of funds to operate programs designed to serve children errolled in parochial schools to a disproportionately greater extent than children enrolled in public schools in Community School District No. 14 violates Title VII of the Elementary And Secondary Education Act of 1965, as amended, and the regulations promulgated therewholer.

FIFTH CTAIN FOR BELIEF

- 95. Plaintiffs repeat and reallege paragraphs 70 through 34 as if such paragraphs were more fully alleged herein.
- greater amount of federal funds for services to parochial school children, both absolutely and in relation to the eligible parochial school population, than for public school children establishes a bilingual education program in parochial schools on a greater scale than that existing in public schools in violation of the first Ameniment to the United States Constitution.

SIXTH CLAIM FOR RELIEF

- 97. Plaintiff's repeat and reallege paragraphs 70 through 84 as if such paragraphs were more fully alleged herein.
- 98. Defendant Community School Foard No. 14's failure to establish a single Community Advisory group, at least 105 of the members of which must be parents of all children directly affected by the program and failure to provide for monthly public meanings of such a group violates the regulations promulgated by the Commissioner of the Office of Education, 45 C.F.R. \$123.16 (39 Fed. Reg. 17968, May 22, 1974).

VI

IRREPARABLE INJURY

ORIGINAL COMPLAINT

99. Plaintiffs and members of their class have no adequate remedy at law. Defendants' continued and systematic maintenance

of split-session classes at Public School 19 has caused, and unless enjoined by this Court, will continue to cause plaintiffs and their class irreparable hardship and injury.

SUCH CHIEFFINAL CONTLAINT

remedy at law. Defendants' provision of bilingual education progress to a dispresent entitely greater extent to children enrolled in parachial achools while failing to provide such services primarily to enildren enrolled in public schools has caused and unless enjoined by this Court, will continue to cause plaintiffs and their class irreparable hardship and injury.

PRAYER FOR RELITER

ORIGINAL COMPLAINT

WHEREFORE, plaintiffs respectfully pray, on behalf of themselves and all others similarly situated, that this Court:

- (a) Enter an order that this action is to be maintaine as a class action.
- (b) Enter a declaratory judgment pursuant to 28 U.S.C. \$2201 declaring that defendants' maintenance of split-session classes violates plaintiffs' rights under the First and Fourteent Amendments to the United States Constitution, Title VI of the Civil Rights Act of 1964, 42 U.S.C. \$2000d, and regulations and guidelines promulgated thereunder.
- (c) Enter a declaratory judgment declaring that an equal educational opportunity for plaintiffs requires the provision of adequate educational facilities and compensatory education.

JA 218 (d) Enter preliminary and permanent injunctions enjoining defendants from continuing to deprive plaintiffs and their classes of an equal educational opportunity by the continued maintenance of split-session classes. (e) Enterpreliminary and permanent injunctions requiring the defendants: (1) to establish and implement an affirmative plan satisfactory to this Court which (A) provides plaintiffs with an equal educational opportunity by constructing an additional educational facility within the community presently served by Public School 20. (F) requires defendants to accelerate the construction of any educational facility presently contemplated by defendants which is located within the community served by Public School 19. (C) provide special programs to compensate to the maximum extent feasible, for defendants past failure to provide plaintiffs and their class with an equal educational opportunity. (2) to submit the above plan to the Court for approval within thirty (30) days of the entering of the order. (f) retain jurisdiction of this action until the defendants fully comply with the order of this Court to the satisfaction of this Court. (6) award plaintiffs their costs and disbursements incurred herein. (h) award plaintiffs reasonable attorney's fees. (i) grant such other and further relief as to this Court may seem just and proper. -: 26 .. .

SUPERFERENCE COMPLAINT.

WHEREFORE, plaintiffs respectfully gray, on behalf of themselves and all others similarly situated that this Court:

- (a) Enter an order that this action is to be maintained as a class action.
- (b) Enter a declaratory judgment declaring that the defendants' provision of special bilingual education programs to a disproportionately greater extent to children enrolled in parochial schools while failing to provide such programs primarily to children enrolled in public schools in District No. 14 violates plaintiffs rights under the First Amendment to the United States Constitution and Title VII of the Elementary and Secondary Elegation Act of 1965, as amended, and regulations promulgated thereunder.
- (c) Enter a declaratory judgment that defendant Community School Board No. 14's failure to establish a single Title VII Community Advisory Board and hold monthly public meetings of such Eoard violates 45 C.F.R. §123.16.
- (d) Enter a preliminary and permanent injunction enjoining defendants from continuing to provide bill mal education programs to a disproportionately greater extent to children enrolled in parochial schools which failing to provide such services primarily to children enrolled in public schools in District No. 14.
- (e) Enter a preliminary and permanent injunction enjoining defendants from failing to establish a single Title VII Community Advisory Committee, at least 50% of the members of which are parents of children directly affected by all Title VII programs, and from failing to hold monthly public meetings of such Committee.

JA 220 (f) Enter a proliminary and personent injunction requiring defendants to identify and demonstrate to the Court by objective evidence the nature and regnitude of the educational. needs of children of limited English-speaking ability residing in District No. 14 enrolled in nonprofit private schools. (g) Enter a preliminary and permanent injunction requiring defendants, after consultation with the Title VII Chromity Advisory Committee pursuant to the faderal regulations to culrit to the Court a plan for a special bilingual education program designed primarily to meet the needs of children of limited English-speaking ability enrated in public schools in District No. 14 with participation of children of limited English-speaking ability enrolled in monprofit private schools to the extent consistent with the number of such children in the (h) retain jurisdiction of this action until the defendants fully comply with the order of this Court to the (1) award plaintiffs their costs and disbursements (j) award plaintiffs reasonable a torneys' fees. . (a) grant such other and further relief as to this Respectfully submitted, EldhBORHOOD LEGAL SERVICE Brooklyn, New York 11211 Tel: 782-6195 KENDETS KINGGOOD HEBBERT TSITESPARM PUERTO RICAN DEGAL DEFENSE & EDUCATION 815 Second Average New York, New York 10017 Tel: 687-6644

area to be served.

incurred bergin.

satisfaction of this Court.

Court may seem just and proper.

AS.

MILLIAMSE 260 Broadway

FUND, INC.

DATED: DROOKLYH, NEW YORK November 21, 1974.

Astermeys for

-23-

Plaintiffs

August Eplegel
JoiCoby To begold
Pictrict file office
310 South First Street
brooklyn, N.Y. 11211

E/E Ponction & 52-57

DOARD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUILDIESS AFFAIRS DUREAT OF RETRIBUGABLE PROJECUS PROTEST EULIGET 1973-1974

Dia	ration of Program:	Sept mber 1	974 - June	30, 1975	
		• • •			DECT OST
	9/12/74	Page 1			
-	P.S. 172 Our Saviour Sts. Veter & Faul, United Talm Leadery, Lath Rochel	ical			
03),	Teacher Assign. as Coordinator	. 1	100%		\$ 16,100
92)	Teacher (Curr. Spec.)	2	1.00%	\$12,000	24,000
92)	Teacher (E.S.L.)	2	3.00%	12,000	24,000
(82	Teacher (S.S.L.)	. 2	100%	12,600	24,000
(52)	Neacher (Y.S.L.)	. 2	100%		12,000
62)	Selbal Secretary .	3.	200%		20,250
18)	Typist (Trov.)	1	. 10/12	5,550	4,625
(55)	Missenger (Frov.)	1	. 10/15	5,550	4,625
(950)	Adjustment Allowance		*		1,110
y.4)*	HI. Assts./Tr. Aides 10 x 5/11/0 x 22/27s. = 12,210 30 x 51/0 x 22/27s. = 53,300	Hrs. x \$4.3	c .		52, 503 1 30 , 536
X9)	Family Asst./Worker 3 x 98/0 x 222275. = 3,33025 1 x528/0 x 222275. = 1,221275	. x \$4.17 . x 4.17		. /	13,887 5,098
	Frince				,
514)	Retirement (red.)-22.52% x (1	10,300			24,851

BOARD OF EDUCATION OF THE CITY OF MEA YORK OFFICE OF BUSINESS AFFAIRS DUREAU OF REIMBURSABLE PROGRAMS PROJECT BURGET 1973-1974

pu	ration of Program: Soutober 1974 - Jan	c 30, 1975	
		PROJECT - COST	
	Page 2		
,)	Social Security-5.85% x \$703,463	\$ 18,104	٠
)	Health-53 x \$350 2 x \$300 .	19,680	
)	Welfere-9 x \$370 W x \$300 2 x \$270	18,830	
)	Trip-TRSOL Convention	744	
)	Conf. & Related Repenses	27.5	
)	Ten (books/Norkbooks	19,000	
)	Instructional Supplies .	12,000	
)	Audio-Visual Supplies	5,857	
)	Office Supplies .	3,∞0	
)	Ferent Involvement-5 Sites x \$250	3.,250	
.)	Telephone	1:00	
)	Cariare	350	1
")	Consultents-12 Sessions x \$50 per	600	1
١	Evaluation(Contract)	8,930	
)	Mon-Prof. Traince-Wh x 12Hrs. = 520Hrs. x \$2.00	1,055	
.)	Prov. Traince (TH) 8 x 18Hrs. = 95Hrs. x \$3.00 Cost of Fregran 6.17% Indirect Cost	203 \$457,974 23,157	
	Total Grant 100% Reimburcable-Title VII-109A 13-1974 Deablighte \$ 19,000	\$85.23\	

100000

OFFICE OF REIMBURGABLE PROGRAMS

ECHOOL DISTRICT 14, DROCKLYN

310 SOUTH FIRST STREET BROOKLYN, MAY YORK HAT

The project coordinator, professional resource people and secretarial and electical parametrial all be assigned to a central location and be involved in all components of the Title VII project. Professional resource personnel (whose specific duties are outlined in the project application) will be responsible for the effective implementation of all aspects, of the instructional program. All Title VII personnel will be exployees of and colely accountable to the Local Education Agency.

A tentative schedule of personnel assignments follows below:

Pesition !	Monday	Tuesday	Veducaday	r Thomaday	Priday
E S.L.	P.S. 122	P.S.122	P.S.122	Sts. PetersPaul/ Ported Tal.	
E.S.L.	Our Saviour	Dar Saviour	Beth Rachel	P.S.122	Seth Rachel
S.S.L.	r.s.122	r.S.122	P.S.122	P.S.122	r.3.122
s.s.)	Our Saviour	Sts.Pater & Paul	Our Saviour	Cor Saviour/ Sts.Peter&Paul	or Savieu./
Y.5.1	Eeth Eachel	inited Tal.	Beth Eachel	Eeth Fachel/ United Tal.	both Packet/ mited Tal.
c.c.	P.S. 122	r.s.122	P.S.122	Sts.Peter&Taul	is Peter Tare
c.c.	Our Saviour	Dur Saviour	Beth Rachel	Beth Rachel	P.S.122

The project coordinator will be required to visit all five sites on a regularly scheduled basis:

TITLE VII SITES	Educat	iola)	Ass'	ts/Teacher Aides	. Family	Workers/Fa	cfly has
» 6 122			10				
P. S. 122 United TaleAdical			5		5	1/2	
· beth Richel 1			15			1	
Saints Peter and Paul	٠٠ .		_2			1/2	
Our Saviour		•	8			1	

JA 224

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL 19, et al.,

Plaintiffs,

-against-

ANSWER

THE COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL DISTRICT NO. 14 OF THE CITY OF NEW YORK, et al.,

follows:

74 Civ. 783 (J.B.W.)

Defendants.

Defendants, by their attorney, W. BERNARD RICHLAND, Corporation Counsel of the City of New York, for their answer to the supplemental complaint respectfully allege as

I

AS TO THE ALLEGED JURISDICTION ORIGINAL COMPLAINT

- l. Deny each and every allegation contained in paragraph "1" thereof except admit that plaintiffs purport to bring this action as a class action on behalf of their minor children, students at Public School 19, and that split session classes have been maintained at Public School 19.
- 2. Deny each and every allegation contained in paragraph "2" thereof except admit that plaintiffs purport to bring this action under the statutes referred to in said paragraph.

SUPPLEMENTAL COMPLAINT

3. Deny each and every allegation contained in paragraph "3" thereof except admit that plaintiffs purport to bring this action as a class action on behalf of their minor children.

4. Deny each and every allegation contained in paragraph "4" thereof except admit that plaintiffs purport to bring this action under the statutes referred to in said paragraph.

II

AS TO THE ALLEGED PARTIES ORIGINAL COMPLAINT

- 5. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "5" thereof.
- 6. Admit the allegations contained in paragraph
 "6" thereof.
- 7. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "7" thereof which relate to plaintiff Jose Garcia.
- 8.-10. Admit the allegations contained in paragraphs "8", "9" and "10" thereof.
- 11. Deny knowledge or information sufficient to
 form a belief as to the truth of the allegations contained in
 paragraph "11" thereof which relate to plaintiff Jenny
 Alvarado.
- 12.-14. Admit the allegations contained in paragraphs "12", "13" and "14" thereof.
- 15. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "15" thereof which relate to plaintiff Maribel Esteres.

- 16.-22. Admit the allegations contained in paragraphs "16", "17", "18", "19", "20", "21" and "22" thereof.
- 23. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "23" thereof which relate to plaintiff Maria Rondon.
- 24.-25. Momit the allegations contained in paragraphs "24" and "25" thereof.
- form a belief as to the truth of the allegations contained in paragraph "26" thereof which relate to plaintiff Jimmy
- 27.-34. Admit the allegations contained in paragraphs "27", "28", "29", "30", "31", "32", "33" and "34" thereof.
- 35. Denv knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "35" thereof which relate to plaintiff Janet Varquez.
- paragraph "36" thereof and respectfully refer the Court to Section 2536-e of the New York State Education Law wherein is set forth the powers and duties of a community school board.
 - paragraph "37" thereof and respectfully refer the Court to Section 2590-f of the New York STate Education Law wherein is set forth the powers and duties of a Community Superintendent.

- 38. Deny each and every allegation contained in paragraph "38" thereof and respectfully refer the Court to Section 2590-q of the New York State Education Law wherein is set forth the powers and duties of the Board of Education of the City of New York.

AC TO THE SUPPLEMENTAL COMPLAINT

- 40. Admit the allegations contained in paragraph "40" thereof.
- 41. Deny the allegations contained in paragraph "41" thereof.
- 42. Now knowledge or information sufficient to form a belief as to the allegations contained in paragraph "42" thereof.

TII

AS NO TES CENSE ACCION ADDICTIONS OF LAINT

- paragraph "43" thereof except admit that plaintiffs purport to bring this action pursuant to Pules 23(a) and (b)(2) of the Federal Pules of Civil Procedure on their own behalf and as a class action.
- 44. Deny each and every allecation contained in paragraph "44" thereof except admit that for the 1973-1974 school year over fourteen hundred children were enrolled at P.S. 19.

- 45. Deny each and every allegation contained in paragraph "45" thereof except admit that each parent named in the complaint has a child attending Public School 19 who is, or has been, in a split session class.
- 46. Deny each and every allegation contained in paragraph "46" thereof.

AS TO THE SUPPLEMENTAL COMPLAINT

47.-49. Deny the allegations contained in paragraphs "47", "48" and "49" thereof.

AS TO THE STATEMENT OF CLAIM ORIGINAL COMPLAINT

- 50.-51. Admit the allegations contained in paragraphs "50" and "51" thereof.
- 52. Deny each and every allegation contained in paragraph "52" thereof and aver that for the school year 1973-74 the student population was 85% Puerto Pican.
- 53. Deny each and every allegation contained in paragraph "53" thereof.
- 54. Deny each and every allegation contained in paragraph "54" thereof except admit that since the 1961-1962 school year, some of the classes in the first, second and third grades of P.S. 19 have been maintained on split sessions.

JA 229

- 55.-56. Admit the allegations contained in paragraphs "55" and "56" thereof.
- 57. Deny each and every allegation contained in paragraph "57" thereof except admit that plaintiffs who are in split session classes receive four hours of daily instruction, and pupils who are not in split session classes receive five hours of daily instruction.
- 58. Deny each and every allegation contained in paragraph "58" thereof and respectfully refer the Court to Section 77(2) of the By-Laws of the Board of Education of the City of New York for the full text of the said By-Law.
- 59. Deny each and every allegation contained in the first sentence of paragraph "59" thereof. Deny knowledge or information sufficient to form a belief as to the truth of the allegations contained in the third sentence of paragraph "59" thereof.
 - 60. Deny each and every allegation contained in paragraph "60" thereof except admit that for the school year 1973-74, Puerto Rican students comprise approximately 26% of the New York City School District population, and that P.S. 94 and P.S. 124 in District 15, and P.S. 86 in District No. 32, maintain split session classes.
 - 61. Deny each and every allegation contained in paragraph "61" thereof and respectfully refer the Court to the report referred to therein for its full text.
 - 62.-63. Deny each and every allegation contained in paragraphs "62" and "63" thereof.

- 64. Deny each and every allegation contained in the first, second and fifth sentences of paragraph "64" thereof and aver that in the last three years the M.A.T. reading scores for grades 2 through 5 at P.S. 19 have improved.
- 65. Deny each and every allegation contained in the first sentence of paragraph "65" thereof and deny know-ledge or information sufficient to form a belief as to the truth of the allegations contained in the third sentence of paragraph "65" thereof.
- 66. Deny each and every allegation contained in paragraph "66" thereof and aver that according to the 1974 report of the Bureau of Attendance, of the twenty-one (21) schools in District 14, P.S. 19 ranked second highest in attendance.
- 67. Deny each and every allegation contained in the first sentence of paragraph "67" thereof and deny the allegations contained in the third sentence of paragraph "67" thereof insofar as they tend to imply that the entire third grade of P.S. 19 attended split session classes.
- 68. Deny each and every allegation contained in paragraph "68" thereof except admit that in 1973, the prefabricated classrooms were demolished, and that the 6th grade students referred to in paragraph "68" attend P.S. 17 for one year before entering Junior High School.
- 69. Deny each and every allegation contained in paragraph "69" thereof except admit that the defendants have sought and received appropriations from the capital budget of the City of New York for the construction of public elementary schools, and aver that the bulk of the funds received by District 14 for school construction in recent years has been

JA 231

used to relieve the overcrowded conditions in the predominantly Puerto Bican area of District 14.

AS TO THE SUPPLEMENTAL COMPLAINT

- 70. Deny each and every allegation contained in paragraph "70" and respectfully refer the Court to the Title VII project application submitted by Pistrict 14, for the school years 1969-1970, 70-71, 72-73, 73-74.
- 71. Dony each and every allegation contained in paragraph "71" and respectfully refer the Court to the Title VII project application for 1973-74.
- 72. Peny each and every allegation contained in paragraph "72" and respectfully refer the Court to the final Title VII project application for 1974-75.
- 73. Deny each and every allegation contained in paragraph "73" thereof.
- 74. Peny each and every allegation contained in paragraph "74" thereof and respectfully refer the Court to the final Title VII grant application, 1974-75.
- 75. Denv each and every allegation contained in paragraph "75" thereof and respectfully refer the Court to the final Title "II grant application, 1974-75.
- 76. Deny the allegations contained in paragraph
 "76" thereof except to admit that a list of the names of the
 members of a Non-Public Community Advisory Board was attached
 to the final Title VII grant application, 1974-75, and

the Court is respectfully referred to the full text of that grant application.

- 77. Deny each and every allegation contained in paragraph "77" thereof.
- 78. Denv each and every allegation contained in paragraph "78" thereof and respectfully refer the Court to the final Title VII grant application, 1974-75.
- 79. Peny each and every allegation contained in paragraph "79" thereof except admit that a public meeting of CSB 14 was held at P.S. 132 on July 24, 1974 at 7:30 P.M. and that a resolution that the Board approve the acceptance of the Title VII grant for the school year 1974-75 was discussed and was not adopted.
- 80. Deny each and every allegation contained in paragraph "80" thereof and respectfully refer the Court to the Minutes of the meeting of September 6, 1974 for its full text and legal effect.
- 81. Deny each and every allegation contained in paragraph "81" thereof and respectfully refer the Court to Exhibit "A" annexed hereto and made a part hereof.
- 82. Deny each and every allegation contained in paragraph "82" thereof and respectfully refer the Court to Exhibit "B" annexed hereto and made a part hereof.
- 83. Deny each and every allegation contained in paragraph "83" thereof except admit that CSB 14 is implementing the program provided for in the Title VII grant for the school year 1974-75.
- 84. Deny each and every allegation contained in paragraph "84" thereof.

AS TO THE CLAIMS FOR RELIEF ORIGINAL COMPLAINT

AS TO THE FIRST CLAIM FOR RELIEF

85. Deny each and every allegation contained in paragraph "85" thereof.

AS TO THE SECOND CLAIM FOR RELIEF

- 86. With respect to paragraph "86" thereof repeats and reiterates with the same force and effect as if fully set forth herein, its answer to paragraphs "1" through "69" herein.
- paragraph "87" thereof, except admit that the public school system of the City of New York receives approximately \$100 million dollars in Federal assistance from the United States government and respectfully refer the Court to Title VI of the Civil Rights Act of 1964, for its full text and legal import.
- 88. Deny each and every allegation contained in paragraph "88" thereof.

AS TO THE THIRD CLAIM FOR RELIEF

- peats and reiterates with the same force and effect as if fully set forth herein, its answer to paragraphs "1" arough "69" herein.
- 90. Deny each and every allegation contained in paragraph "90" thereof.

SUPPLEMENTAL COMPLAINT

AS TO THE FOURTH CLAIM FOR RELIEF

- 91. With respect to paragraph "91" thereof, repeats and reiterates with the same force and effect as if fully set forth herein, its answer to paragraphs "70" "84" herein.
- 92. Deny each and every allegation contained in paragraph "92" thereof.
- 93. Deny each and every allegation contained in paragraph "93" thereof and respectfully refer the Court to 20 USC \$880b, et. seq., 45 C.F.R. \$123.4, et. seq. for their respective terms and provisions.
- 94. Deny each and every allegation contained in paragraph "94" thereof.

AS TO THE FIFTH CLAIM FOR RELIEF

- 95. With respect to paragraph "95" thereof, repeats and reiterates with the same force and effect as if fully set forth herein, its answers to paragraphs "70" through "84" herein.
- 96. Deny each and every allegation contained in paragraph "96" thereof.

AS TO THE SIXTH CLAIM FOR RELIEF

- 97. With respect to paragraph "97" thereof, repeats and reiterates with the same force and effect as if fully set forth herein, its answers to paragraphs "70" "84" herein.
- 98. Deny each and every allegation contained in paragraph "98" thereof.

v

AS TO THE ALLEGED IRREPARABLE INJURY ORIGINAL COMPLAINT

99. Deny each and every allegation contained in paragraph "99" thereof.

THE SUPPLEMENTAL COMPLAINT

100. Deny each and every allegation contained in paragraph "100" thereof.

FOR A FIRST AFFIRMATIVE DEFENSE

101. The supplemental complaint fails to state a claim upon which relief may be granted.

FOR A SECOND AFFIRMATIVE DEFENSE

102. Plaintiffs may not maintain this action as a class action under the standards set forth by Fule 23 of the F.R.C.P.

FOR A THIRD AFFIRMATIVE DEFENSE

- Board 14, on June 26, 1974, a resolution was passed which would have completely eliminated the split sessions at P.S. 19 complained of in this action.
- effective with the 1974 fall term, eight fifth grade classes and five fourth grade classes would be transferred to existing vacant space at the neighboring P.S. 122 Annex, and the resolution further provided that the transfer be on an interim basis pending the completion of the Early Childhood Center directly adjoining P.S. 19 which Center is now under construction and scheduled for completion by the fall of 1975.

105. Accordingly, the causes of action raised in the complaint have become most and there is no justiciable controversy presented herein.

FOR A POURTH APPIREMENTALE PERFORMENT

P.S. 19 in good faith, for the purpose of relieving the serious overcrouding at P.S. 19, and without any considerations of race or otheric background.

107. The plaintiffs have chosen to continue split session instruction at P.S. 19 in that they have refused to permit their children to attend classes at an educational facility found acceptable for the alleviation of split session at P.S. 19 by this Court.

EUS Y EINCH VEGLERAMINE PERENCE

plaintiffs or their affiliates the possibility of eliminating the split sessions by transferring classes from P.S. 19 to adjoining schools. Plaintiffs have rejected each and every alternative proposal put forward by Defendant Community School Poard in this regard.

FOR A SIXTH APPIPMATIVE DEFENSE

109. The plaintiffs have failed to exhaust their administrative remedies under Section 2590-1 of the New York State Education Law and the rules and regulations promulgated thereunder.

FOR A SEVENTH AFFIRMATIVE DEFENSE

75 which provides bilingual educational services to children in public and non-public school complies with the

provisions of Title VII of the Elementary and Secondary
Education Act of 1965, as amended, the regulations promulgated thereunder, and the First Amendment to the United
States Constitution.

FOR AN EIGHTH AFFIRMATIVE DEFENSE

by Community School Board No. 14 for consultation for bilingual programs administered under Title VII complies with regulations promulgated under 20 USC \$880b et. seq.

FOR A NINTH AFFIRMATIVE DEFENSE

112. Plaintiffs' supplemental complaint should be dismissed as barred by laches.

FOR A TENTH AFFIRMATIVE DEFENSE

administrative remedy provided by the regulations promulgated under 20 USc 880b et. seq.

WHEREFORE, defendants respectfully request judgment dismissing the supplemental complaint and denying the relief requested therein in all respects together with the costs and disbursements of this action, and such other and further relief as the Court deems just and proper.

Dated: New York, New York February /9, 1975

> W. BERNARD RICHLAND Corporation Counsel City of New York Attorney for Defendants Municipal Building New York, New York 10007 566-6377/2086/2192

By:

ROSEMARY CARROLL
Assistant Corporation Counsel

OFFICE OF REIMBURGABLE PROGRAMS

ECHOOL DISTRICT 14, DROOKLYN

BIO SOUTH FIRST STRUCT BROOKLYN, NEW YORK HEN

The project coordinator, professional resource people and secretarial and elerical personnel will all be assigned to a central location and be involved in all components of the Title VII project. Professional resource personnel (whose specific duties are outlined in the project application) will be responsible for the effective implementation of all aspects of the instructional program. All Title VII personnel will be employees of and solely accountable to the local Education Agency.

A tentative schedule of personnel assignments follows below:

Position !	Monday	Tuesday 1	Wednesday (Priday
E.S.L.	P.S. 122	P.S.122	P.S.172	Sta. Peteralau1/	
				Waited Tal	inited Tal
E.S.L.	Our Saviour	Dar Saviour	Beth Rachel	P.S.122	leth Rachel
S.S.L	P.S.122	P.S.122	Y.S.122	r.s.122	r.s.122
S.S.L.	Our Saviour	Bis. Teter &	Our Saviour	Car Saviour/ Sts.PetertPaul	Dur Savieur/ Sts. Peterbraul
		Paul		Sts. Tett for aut	l'estrett lori, ar
Y.S.L.	Reth Rachel	inited Tal.	Both Pachel	Path Backel/ Daited Tal.	heth Enchel/ Inited Tal,
c.c.	· P.S.172	P.S.122	P.S.122	Sts.PeterWaul	its, Peter&Paul
c.c.	Our Saviour	Por Saviour	Beth Rachel	Feth Rachel	r.S.122
		•			•

The project coordinator will be required to visit all five sites on a regularly scheduled basis:

TITLE VII SITES	Educational	Ass't	s/Teacher Aides	Family	Workers	s/Family Ass	
P. S. 122		10			1	/	
United Talmidical	7	5			1/2		
Beth Rachel	.v	15			.1		
Saints Peter and Paul	•	_2			1/2		
Our Saviour		8			1		

DOALD OF EDUCATION OF THE CITY OF NEW YORK OFFICE OF BUSINESS AFFAIRS BUREAU OF REIMBURSABLE PROSPAMS FROJECT BUIGET 1973-1974

		FROJECT COST	٠
	Page 2		
c740)	Social Security-5.85% x \$309,468	\$ 18,104	
0707)	H-alth-53 x \$500 2 x \$500 .	19,650	
C744)	Welsere-9 x \$570 104 x \$340 2 x \$276	18,830	
C 405)	Trip-TANOL Convention	744	
ch90)	Conf. & Related Barenses	R.Z	
c 337)	Textbooks/Workbooks	19,000	
C137)	Instructional Supplies '	12,000	•
(111.)	Autho-Vienni Du sties	5,507	
(0.00)	Office Supplies .	3,000	
(c':9))	Forent Involvement-5 Sites x \$250	1,250	
(2402)	Telephone	1:00	,
(C40'1)	Caritre	350	- 1
(cl:19)	Consultaris-12 Crasions x \$50 per	600	
(C421)	Evaluation(Contract)	8,930	
(c912)	Non-Prof. Traince-44 x 12Hrs. = 523Hrs. x \$2.00	1,056	
(c 916)	Prov. Trainee (TR) 8 x 12Hrs. = 95Hrs. x \$3.00 Cost of Program 6.17% Indirect Cost Total Grant	223 \$457,074 23,197 \$46,131	

Notice of Motion for Summary Judgment

UNITED STATES OF TOTAL COURT EASTERN DISTINCT OF ROW YORK

PARENTS' COMMITTED OF PUBLIC SCHOOL fls. et al.,

Plaintiffs,

-against-

NOTICE OF MOTTON FOR SUMMARY JUDGMENT

COMMUNITY SCHOOL ROWED OF COUNTRIES SCHOOL FORED TRA

74 C 783

Defendants.

Notion by:

Municipal defendants

Date, Time and Place of Motion:

March 10, 1975, at 9:30 a.m. in the Un ted States Court Pouse, Constructa, 10, 6th Loor, 225 Cadmen Plaza East, Probling, New York Lafove the honorable Jack B. Veinstein, District Juc

Peliaf Demanded:

An order pursuant to Rule 56 of the Federal Rules of Civil Procedure dismissing the complaint upon the grounds that there are no briable issues or that and the sumicipal defendants are entitled to judgment as a matter of law and further attay. their response to discovery until the disposition of this motion and granting municipal defendants the costs of this motion.

Supporting Papers: "Efidavit of Morman Spiegel

Dated: February 24, 1975

fours, etc.

W. BEFURRE FICHLAND Cornoration Counsel Attorney for Municipal Defendant Municipal sailding New York, 1197 York 566-2006/2192/2193 10007

LOSEMARY CARCOLL Assistant Comporation ConUNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

parameter of purity

PARENTS' COMMITTEE OF PUBLIC SCHOOL \$19, et al.,

Plaintiffs,

-against-

AFFIDAVIT

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL BOARD #14 OF THE CITY OF NEW YORK, et al.,

Defendants.

STATE OF NEW YORK)
: SS.:
COUNTY OF NEW YORK)

NORMAN SPIEGEL, being duly sworn, deposes and says:

- 1. I am the Director of the Re-imbursable Programs for Community School District No. 14 and submit this affidavit in support of defendants' motion for summary judgment.
- 2. My duties as Director of Re-imbursable Programming include the preparation and filing of grant applications for re-imbursable funds under Title VII of the Elementary and Secondary Education Act (E.S.E.A.), 28 U.S.C. 880b et. sec.
- 3. Commencing with the school year 1970-71 District 14 received a grant from the United States Office of Education (H.E.W.) for a five-year project under Title VII.

 In that year, the District received \$150,000 for instructional services, materials and supplies, administrative services and staff development services as set forth in Exhibit "A" annexed hereto.
- 4. This project was designed to establish and develop an experimental early childhood instructional programutilizing a bilingual, bicultural assistant to assure the more effective participation of non-English dominant children in the educational process. In view of the large numbers of

Spanish-speaking children in the District, the project was directed exclusively at that target population.

- 5. For the second year (1971-72), this grant provided \$152,974 for instructional services, materials and supplies, administrative services and staff development services as set forth in Exhibit "B" annexed hereto.
- of the thire year (1972-73) this grant provided \$154,323 (including a carryover of \$4,323 from the prior year) for instructional services, materials and supplies, administrative services and the staff development services as set forth in Exhibit "C" annexed hereto.
- 7. For the fourth year (1973-74) this grant provided \$145,000 (including a carryover of\$16,235 from the prior year) for instructional services, materials and supplies, administrative services and staff development services as set forth in Exhibit "D" annexed hereto.
- 8. Thus, for the previous four years (see Exhibits A-D) the Title VII grant has been utilized solely to provide services for Spanish-dominant English-language handicapped children in the District. Predominantly, these funds totalling approximately \$582,000 were allocated for the Bilingual Early Childhood Center located at PS 122 in District 14. No instructional services for children in non-public schools were provided. A minimal allocation was made for staff development services.
- 9. In the fifth and final year of this continuing five year project under Title VII (1974-75), District 14 submitted an application for funds which for the first time made provision for the allocation of instructional service. to children in non-public schools in the district.

- 10. This application was submitted in two parts, to wit, a Spanish-English component for P.S. 122, Sts. Peter and Paul, and Gur Savior; and a Yiddish-English component for United Talmudical Academy and Beth Rachel.
- approved by the United States Office of Education (HEW) on June 26, 1974 in the amount of \$486,231 (including a carry-over of \$19,000 from the previous year). The subject grant application is a continuation of a five-year project under Title VII which expires June 30, 1975. The breakdown of services procured under this funding is set forth in the Title VII application materials annexed hereto as Exhibit "E".
- intended to provide for financial assistance to local educational agencies for exemplary pilot or demonstration projects in bilingual and bicultural education in a wide variety of settings. These projects should stimulate and encourage the development and operation of new and imaginative programs which meet the special needs and potential of the target group. "New and imaginative" means programs which either have not existed previously for persons of the target group or are to be substantially increased, improved or extended.
- 13. In contrast to Title I, which Congress funded with the goal of directly aiding all children in need of such funds, Title VII is designed to provide bilingual services solely to representative children in model projects.
- 14. Within this conceptual framework, the District compiled statistics describing the incidence of English language-bandicapped children throughout the district.

The Public Schools, the District employed
the Language Data Survey which had been utilized by the
Board of Education for such purposes. As of October 31, 1973,
the survey revealed that of the 26,654 children tested,
17,916 children came from homes where Spanish is the dominant
language, of these; 10,357 were classified as Language
Category III, (children who speak English and are not in
need of bilingual services), 5161 who were classified as
Category I (moderately language handicapped) and 2498
children were classified Category II (severely language
handicapped). Annexed hereto as Exhibit "F" is a copy of
said Language Date Survey.

the non-public schools in District 14. However, a language data survey utilizing techniques similar to those employed in the public schools was used in the non-public schools for classification of language handicapped children. This survey revealed that of 11,095 children enrolled at the Hebrew Day Schools and included in the survey, 7,890 children were Yiddish-dominant, English language handicapped. A copy of this survey is annexed ereto as Exhibit "G". (See also Exhibit "T" for statement of selection criteria for program participants).

16. A similar language data survey conducted in the other parochial schools in District 14 revealed that of 6911 children surveyed, 2491 were Spanish-dominant English-language handicapped. Annexed hereto as Exhibit "H" is the survey of the Catholic parochial schools.

17. As provided in 20 USC §880b-3b(3)B:

- (B) that, to the extent consistent with the number of children enrolled in nonprefit private schools in the area to be served whose educational needs are of the type which this program is intended to meet, provision has been made for participation of such children;
- 18. It is my understanding that this section is designed to benefit children and not schools and to insure that certain children would not be discriminated again merely because they attend a private parochial school.
- 19. To effect this purpose the local public educational agency has wide latitude in fashioning programs of direct benefit and advantage to elementary and secondary school pupils regardless of whether or not they are enrolled in public schools.
- 20. This provision of the E.S.E.A. has enabled District 14 to develop, improve and extend a Model Early Childhood Bi-Lingual Program at P.S. 122 which is completing its fifth and final year.
- develop a new and imaginative program for children in the non-public schools indicated above which previously did not exist. In fact, the Yiddish-English component of the District's Title VII project is the first of its kind in this country.
- 22. Moreover, the participation of the parochial schools in the Title VII program has been the impetus for legislatively favored dialogue between the officials of the District and the representatives of the non-public schools.
- 23. Since September 1974, the District has been delivering services in accordance with the allocations approved by the Office of Education (N.E.W.) under the current Titel VII grant.

application for relief, not only would this impede the developing dialogue with the non-public schools, but, occuring mid-year, it would seriously disrupt the education of children in the affected schools.

25. This is particularly disturbing in light of the fact that since February, 1974, plaintiffs have because of the schools targetted for participation in the year's Title VII grant and have at no time prior hereto contested the provisions of that grant. Consequently, the District, and, more importantly, the children being serviced by the Title VII grant will be prejudiced by plaintiff's dilatory attack herein.

grant was submitted to and approved by the Office of Education (H.E.W.) upon the prior participation and advice of the parents of the affected children.

A parent advisory committee was established to represent the Spanish-dominant children in the project. This "Bi-lingual Program Parents Consultation Committee" represented the parents of affected children at P.S. 122, Sts. Peter and Paul, and Our Savior. (Exhibit "I")

Similarly a parent advisory committee was established to represent the Yiddish-dominant children in the project.

(Exhibit "J")

27. I have been advised by the Office of Education (H.E.W.) that the two parents advisory committees should be consolidated into a single parents advisory committee for bi-lingual programs under Title VII. In this regard I have completed organization of such a unified committee.

28. In conclusion, during the first feur years of this five year project approximately \$582,000 in Title VII funds have been allocated for the eligible children in the public schools. For the same period, virtually no funds were allocated for eligible children in non-public schools.

In the fif h and final year of this five year project, the P.S. 122 project will be receiving an allocation of \$150,000. Approximately \$330,000 is allocated for children in the non-public schools for the current school year.

\$732,000 has been allocated for service to eligible children in the public schools of the district whereas \$330,000 has been allocated for eligible children in the non-public schools of the district.

- 29. Plaintiffs' assertion that the non-public school children are receiving a disproportionate allocation of Title VII services is manifestly without merit particularly in view of the comparative number of eligible Title VII children in the public and the non-public schools.

 (See Exhibits "F", "G" and "H").
- and effort in consultation with parents advisory groups, the New York City Board of Education, the New York State Office of Education and the Office of Education (H.E.W.) in designing and implementing the current Title VII project. The Court should refrain from substituting its judgment for that of the educational experts and should reject plaintiffs' ill-considered attempt to, in effect, pit two needy groups of children against each other for limited federal funds.

JA 248

paged upon the foregoing and in view of the burden that extensive discovery places upon the municipal defendants it is respectfully requested that this Court stay defendants responses to plaintiffs' second interrogatories and notice to produce documents pending the disposition of this letion.

NORMAN SPIEGEL

Sworn to before me this 24th day of February, 1975 UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

PARENTS' COMMITTEE OF PUBLIC SCHOOL #19, et al.,

Plaintiffs,

STATEMENT OF MATERIAL :FACTS AS TO WHICH THERE IS NO CENUINE :ISSUE TO BE TRIED

-against-

COMMUNITY SCHOOL BOARD OF COMMUNITY SCHOOL BOARD #14 OF THE CITY OF NEW YORK, et al.,

Defendants.

Pursuant to Rule 9(g) of the General Rules of this Court, defendants, having moved for summary judgment, submit this statement of material facts as to which defendants contend there is no genuine issue to be trice, in support thereof.

The municipal defendants' moti. Is predicated on the ground that the Title VII grant appl. Sion for the school year 1974-75 complies in all respects with the provisions of Title VII of the Elementary and Secondary Education Act of 1965, as amended, the regulations promulgated thereunder, and the first amendment to the United States Constitution, in that, inter alia, (i) to the extent consistent with the number of children enrolled in non-profit private schools in the area to be served whose educational needs are of the type which this program is intended to meet, provision has been made for participation of such children; and (ii) the parents advisory committee established by Community School Board No. 14 for consultation for bilingual programs administered under Title VII complies with regulations promulgated under 20 USC \$8895, et. seg.

With respect to (i) the following facts are not in dispute:

1. Commencing with the school year 1970-71 District
14 received a grant from the United States Office of Education (H.E.W.) for a five-year project under Title VII.

- 2. For that year, the District received \$150,000 for instructional services, materials and supplies, administrative services and staff development services for a model project at P.S. 122.
- 3. This project was designed to establish and develop an experimental early childhood instructional program utilizing a bilingual, bicultural approach with the intention of assuring the more effective participation of non-English dominant children in the educational process.
- 4. The project was directed exclusively at Spanishspeaking children is the District.
- 5. For the second year (1971-72), this grant provided \$154,323 (including a carryover of \$4,323 from the prior year) for instructional services, materials and supplies, administrative services and the staff development services.
- 7. For the fourth year (1973-74) this grant previded \$145,000 (including a carryover of \$16,235 from the prior year) for instructional services, materials and supplies, administrative services and staff development services.
- 8. For the years 1970-1974 the Title VII grant has been utilized solely to provide services for Spanish-dominant English-language handicapped children in the District.
- 9. This grant totalling approximately \$582,000 was allocated for the Bilingual Early Childhood Center located in PS 122 in District 14.
- 10. No instructional services for children in non-public schools were provided for the years 1970-74 under the Title VII grant.
- 11. In the fifth and final year of this continuing five year project under Title VII (1974-75), District 14 submitted an application for funds which for the first time made provision for the allocation of instructional services to

children in non-public schools in the district.

- 12. This application included a Spanish-English component for P.S. 122, Sts. Peter and Paul, and Our Savior; and a Yiddish-English component for United Talmudical Academy and Beth Rachel.
- 13. The grant application for Title VII funds for 1974-75 was approved by the United States Office of Education (HEW) on June 26, 1974 in the amount of \$486,231 (including a carryover of \$19,000 from the previous year).
- 14. The 1974-75 grant application is a continuation of a five-year project under Title VII which expires June 30, 1975. The breakdown of the services procured under this funding for 1974-75 is set forth in Exhibits "A" and "B" annexed hereto and made a part hereof.
- 15. For the first four years of this five year project approximately \$582,000 in Title VII funds have been allocated for the eligible children in the public schools.
- 16. The District has compiled statistics describing the incidence of English language-handicapped children in the public schools throughout the district as of October 31, 1973.
- District employed the Language Data Survey which had been utilized by the Board of Education for such purposes.
- that of the 26,654 children tested, 17,916 children came from homes where Spanish is the dominant language.

 Of these 17,916, 10,357 were classified as Language Category III, (children who speak English and are not in need of bilingual services), 5161 children who were classified

as Category I (moderately language handicapped) and 2498 children were classified as Category II (severely language handicapped).

- 19. This Language Data Survey is not employed in the non-public schools in District 14.
- 20. A language data survey utilizing techniques similar to those employed in the public schools was used in the non-public schools for classification of language handicapped children for the year 1974-75.
- 21. This survey revealed that of 11,095 children enrolled at the Hebrew Day Schools and included in the survey 7,890 children were Yiddish-dominant, English language handicapped.
- 22. A similar language data survey conducted in the Roman Catholic parochial schools in District 14 revealed that for the year 1974-75, of 6911 children surveyed, 2491 were Spanish-dominant English-language handicapped.
- 23. The Yiddish-English component of the District's Title VII project is one of the first of its kind in this country.
- 24. The participation of the parochial schools in the Tible VII program has been the impetus for a dialogue between the officials of the District and the representatives of the non-public schools.
- 25. Since September 1974, the District has been delivering services in accordance with the allocations approved by the Office of Education (H.E.W.) under the current Title VII grant.
- 26. Disruption of the 1974-75 Title VII program occurring mid-year is detrimental to the education of children in the affected schools.

- 27. Disruption of the 1974-75 Title VII program mid-year threatens—the dialogue between the officials of the District and the representatives of the non-public schools.
- 28. Since February, 1974, plaintiffs have been aware of the schools targetted for participation in this year's Title VII grant.
- 29. Prior to December 1974, the plaintiffs did not institute any proceeding challenging the provisions of the 1974-75 Title VII grant.

With respect to (ii) the following facts are not in dispute:

- 30. The current Title VII grant was submitted to and approved by the Office of Education (H.E.W.) on June 25, 1974, upon the prior participation and advice of the parents of the affected children.
- 31. A parent advisory committee was established to represent the Spanish-dominant children in the project.
- 32. This "Bi-lingual Program Parents Consultation Committee" represented the parents of affected children at P.S. 122, Sts. Peter and Paul, and Our Savior.
- 33. A parent advisory committee was established to represent the Yiddish-dominant children in the project.
- 34. A single Parents Advisory Committee has been established by the District.
- 35. For the five year duration of the Title VII project 1970-75, \$732,000 has been allocated for service to eligible children in the public schools of the district whereas approximately \$330,000 has been allocated for eligible children in the non-public schools of the district.

and effort in consultation with parents advisory groups, the New York Cley Board of Education, the New York State Office of Education and the Office of Education (M.E.W.) in designing and implementing the current Title VII project.

W. BERNARD RICHLAND
Corporation Counsel
Attorney for Municipal Defendants
Municipal Building
New York, New York 10007
566-2086/2192/2193

OFFICE OF REIMBURGABLE PROGRAMS

BCHOOL DISTRICT 14, DROOKLYN

BIO SOUTH FIRST STREET BROOKLYN, NEW YORK HALL

The project coordinator, professional resource people and secretarial and clerical personnel will all be assigned to a central location and be involved in all components of the Title VII project. Professional resource personnel (whose specific duties are outlined in the project application) will be responsible for the effective implementation of all aspects of the instructional program. All Title VII personnel will be employees of and molely accountable to the Local Education Agency.

A tentative schedule of personnel assignments follows below:

					4
Position !	Monday	Tuesday	Meduenday	Thursday	Priday
E.S.L.	P.S. 122	P.S.122	P.S.122	Sts. Peter & Paul/	Sts. Peterblaui
			0	Doited Tal	'nited Tal
E.S.L.	Our Saviour	Dar Saviour	Beth Rachel	P.S.122	leth Rachel
s.s.h	P.S.122	P.S.122	P.S.122	r.s.322	r.s.122
S.S.L.	Our Saviour	Paul	Our Saviour	Car Saviour/ Sts. Peter&Paul	our Saviour/ Sts.Peter&Paul
Y.S.L.	Both Eachel	mited Tal.	Bath Pachel	Poth Rachel/ United Tal.	Noth Enchel/ United Tal,
c.c.	·	P.S.122	P.S.122	Sts. Peter Fraul	its, Peter&Paul
c.c.	Our Saviour	Dar Saviour	Beth Rachel	Beth Rachel	r.S.122

The project coordinator will be required to visit all live sites on a regularly scheduled basis.

TITLE VII SITES	Educat	iolial	L Ass!	is/Teacher Aides	. Family	Workers/F	serfly_Ash!
P. S. 122			10			1 ,	
United Talmidical			5			1/2	
· Neth Eachel	.v		-15			1	
Saints Peter and Paul	••		_2.	•		1/2	
Our Saviour	•		3		•	1	
	WHEN THE PROPERTY OF THE PARTY						

POALD OF LEUCATION OF THE CUTY OF NEW YORK OFFICE OF BUSINESS AFFAIRS FUREAU OF REIMBURSANCE PROSPARS PROJECT BUIGGT 1973-1974

1 rogr	on Military Family C. (1) Check Cont	07		_
Du	ration of Program: Sentumber	1071: - Care	30, 1975	
		2	TROJECT - COST	:
(c740)	Social Security-5.85% x \$109,468		\$ 18,104	-
(0707)	Noalth-53 x \$360 2 x \$300 .		19,650	
(c741)	Melfere-9 z \$570 W x \$340 2 x \$270		18,830	
(C405)	Trip-TRIOL Convention		. 744	
(0190)	Conf. & Related Regenses .		856	
(c337)	Textbooks/Workbooks		19,000	
(0130)	Enstructional Supplies '		12,000	
(0111.)	Autho-Visual Supplies		5,857	
(c100)	Office Supplies .		3,000	
(0':9)	Ferent Involvement-5 Sites x \$250		1,250	
(2402)	Telephone		1:00	
(0401)	Cariare		350	
(02.19)	Consultants-12 Gausians x \$50 per		600	
(char)	Evaluation(Contract)		8,930	
(chis)	Mon-Prof. Trainec-We x 12Hrs. = 528Hrs.	x \$2.00	1,056	
(6916)	Prov. Trainse (TR) 8 x 19Hrs. = 95Hrs. Cost of F 6.17% India	regren eet Cest	\$03 \$157,976 \$51,97 \$153,654 \$153,654	
19	100% Reimburcoble-Title VII-100A	diibit "B"		

JA 257

Municipal Defendants' Motion for Summary Judgment

EXHIBITS

Annexed to Affidavit of Norman Spiegel

INITIAL PLAN FOR THE SMEDICINENTATION OF A DICKE

Under the Provisions of Title VII, ESEA

DILINGUAL PRE-SCHOOL LEARNING CENTER

Subritted by: District 14, Brooklyn

223 Graham Avanue

Brooklyn, New York 11205

Mr. Ralph T. brande, Superintendent - Mr. Daniel Portelles Substitted to: Division of Plans and Supplementary Centers Project Di Project Director

Fureau of Elementary and Secondary Education

U. S. Office of Education 400 Maryland Avenue, S. W. Washington, D. C. 20202

Unte Transmitted: Month Year

^{*}Indicate the purpose for submitting this application: Initial Plan for the Implementation of a Bilinoual Education Program; or Application for Continuation

PROGRAMS UNDER MILITIONAL EDUCATION ACT (COLOR VILTERIA)

JA 259

VASTICATION

PART 1 - CLIEBAN DITCHMAT OF

	Ob Assim	ad Project Number
SECTION A PROJECT INFORMATION Prelim. Pro	Such and the Corne (Cons.	2 15-2 :
PROJECT TITLE: BILLINGUAL PRE-SCHOOL	LEARNING CENTUR	
PROJECT SUMMAY: (For Initial Plan Only)	(See Attached Ehect)	
		.
	nabungh-Greenwoint, Br occi Educational Agency)	ooklyn, R.Y.
. 223 Graban Avenue (Stre	et Aderess)	· i
Brooklyn, New York	11205 State	Zip Code)
212 - FW- 7-2018 (Office Telephone	Area Code and Numbe	r)
. Name of Superintendent.		e com and Section Control of the con
CONSNESSIONAL DISTRICT(S) 14 JOINT APPLICANT:	COUNTY (IUS) Y	INGS
	Street Address)	
(Office Telephone	Area Code one Number	
(Signa)	ture of Authorized Represent	ative)
NAME OF PROJECT DIRECTOR: Mr. Daniel	N. Porveiles Phone t	to. AC 212' 4 387-453
223 Graham Avenue B (Street Address)	rooklyn, New York 1129 (City	State Zip Code)
certify that the information contained in rest and the local educational agency n file this soulination.	n this application, is, to a smed above, has authorized a	the best of my knowledgeme as its representative
gnature of Person Authorized to Receive	Grant	Date Submitted
		THE RESERVE OF THE PARTY OF THE

The District 14 Billingual Pre-School Learning Center will serve as an Early Childhood Billingual Demonstration Center will the Williamsburg-Greenpoint section of Brooklyn, an area with a school population of 29,000 children where almost 65% are of Spanish-speaking background.

The major emphasis of the Bilingual Pre-School program will be in developing skills in the dominant and second language through carefully planned activities which can be measured in terms of behaviors.

Lenguage will be the program called DTSTAR. Distar will form the base care for the structured lessons of language in Pre-K and Language and Readiness in Kindergurten. The Distar program will utilize both Spanish and English as mediums of instruction. The children will be taught two lessons daily; one in their deminant language and the same lesson in their second language.

The periods of work/play, music, literature, physical activities, cultural, enrichment, etc., will allow for the normal
flows of communication in a mixed small group setting. Blocks,
teleplay, theater, doll corner, and an array of multisensory games
activities will facilite the use of both languages. The teacher
and paraprofessional will utilize this period of activities to
reinforce vocabulary and concept development in the childs dominant
and second language; and will maintain a small group instructional
setting.

A Family Worker and a Family Assistant who are bilingual will provide special services to parents both in and out of school. During school hours they will meet with parents in the Family Room to discuss the bilingual program and to assist parents with their problems and offer possible solutions.

Public School 122 will house the Pre-School Learning Center for both the Bilingual and non-Bilingual components. Of the schools 340 Pre-Kindergarten and Kindergarten students, 30 Pre-K

and 50K children will partitipate in the Bilingual Demonstr two.

Project. Of these children 65% will be chosen because of their dominance in the Spanish Language and 35% will be chosen because of their dominance in the English Language. This dominance will be determined through questioning the child's parents at refer tration and an eral interview with the child conducted by tham of bilingual parents and teachers. (Bilingual Program Commune of District 14).

the control of the co	PARAMETER MAKE	
	I lot Year 261 Year S.d Year 4th Year 5th Year 17	CAD.
The Milliania	1 150,000	
otto a translationed to be a fundo .	11,0,000	
14. · [· ·] 17. 22.		
and Cardo	10.500	
Mer Colls		
real presented beings	1300,500 1	

ent Topolacion Dara		Pro-	K .	1	1 2	3	Elemen.	Second-	Total
Main of NAMA for Many school year	Pablic (1) . School		27.00	-		-			
XX	Newpublic(2) School	0	0			-			
er el subbleen ha DAA virse Las lenguage is not English	Pablic (1) Sebool	565	1835						
	Tompublic (2).	0	0						
filtojaat area for preceding	Inblic (1)	60	1 200			1			
ol year	Hongubile (2)	0	0						
r of collered in project where fauluant language is	Poblic (1)	48	1.60			-			
17.45 JA	Purpublic (2)	C	! 0 !			i -			
er of entitieren in progess Muse da imant tragango is	Public (1)	20.	32	·					
inglish who would partici-	Nonpellic (2)	0	0						
r of callered in project	Public (1)	10	18						
the we would participate	flongablic (2)	0_	10						
1 no ber of children in	Publiqu(1) / f(1))	30_	50		1				
in project .	Housenb. (0(2) / ((2))		!		-	!			
	Total (n(1) + n(2))	30	1 50						

The office of the daily membership for the school year divided by actual days school was in session taxel Commational Arracy

⁻public cohords will not participate during the first year since there aren't any me-K and K concuts in the project area. However, Non-public school teachers will provide any me-K and K ining program.

JA

BOARD OF EDUCATION OF THE CATY OF PER YORK OFFICE OF PUBLICUES AFFILES AFFILES PROSPARS PROJECT BUDGET 1972-1972

Duration of Program: July 1, 1971 - June 30, 1972 (/// Sees)

march Component	199660	AMOUNT OF	PROJECT COST
alatant Coordinator (L307) 2 hrs. x 29 days= hrs. x \$ 12.91 por hr.	:	•	
achers (1392) 3 hrs. per day x 29 days = 1 hrs. x \$ 10.75 per hr.			\$ 749
ainee Professional (1916) Phrs. x 29 days =	3		2,506
hrs. x \$ 3 per hr. acational Asst (L904)	1		174
hrs. x 29 days = hrs. x \$ 3.15 por hr.	<i>I</i> _t ·		1,000
chars Aides (L910)			5?
x24 day=120 hrs. x29 day=145 hrs. x29 days=87 hr.)352 hrs. x \$ 2.80 por hr.	3		936
ntien 5% x 352 hrs. = ur x \$ 2.80 psr hr.			, , , , , , , , , , , , , , , , , , , ,
ssistant (1.905) ays=17h hrs. por hr.	2		51
t' 5% x 174 hrs. = . \$ 3.15 per hr.			549
on Professional (L912) 29 days = 1. x \$ 2 per hr.			29
rplies (C1li1)			403
ervico (c439)			€

Dans d

BOARD OF PERCENTION OF THE CITY OF RIM YORK OFFICE OF BUSINESS AFFAIRS TO BURLIUS OF FRIMERICABLE PROGRAMS PROJECT BUBGET 1971-1972

Duration of Program: July 1, 1971 - July 30, 1972 (12 months)

AMOUNT OF PROJECT COMMITTED COMMITTE		Duration of Program: July 1, 197	1 - 300.0 30	0, 1972 (12 months,)
rips Pus - (Ch21) maic - Visual Supplies (C111) Jassroom Supplies (C113) arent Involvement Fund (Ch99) LHOOL YEAR SEPT - JUNE irector (L151) 1 6/12 22,795 11 1chs a (L192) x \$ 10,500 3 10mos 10,500 31 outher (Curr-Developer) (L392) 0 hours x \$ 11.68 per hr. 4 ducational Assit (L904) A6 hrs. x 211 days = 362 hrs. x \$ 3.45 per hr. 30 mi Assit (L905) 6 x 211 dys = 264 x \$ 3.45 per hr.			Nowber			
rips Pas - (C421) Indic - Visual Supplies (C111) Descroom Supplies (C113) arent Involvement Fund (C49) LHOOL YEAR SEPT - JUNE irector (L151)					14%	\$:::
drector (L151) 1 6/12 22,795 11 1cho.s (L192) x \$ 10,500 3 10mos 10,500 31 outher (Curr-Developer) (L392) 0 hours x \$ 11.68 per hr. ducational Assit (L904) x6 hrs. x 211 days = 362 hrs. x \$ 3.45 per hr. 30 smi Assit (L905) x6 x 211 dys = 264 x \$ 3.45 per hr.	rips P	203 - (0421)			. \	727
arent Involvement Fund (C499) ChOOL YEAR SEPT - JUNE irector (L151) 1 6/12 22,795 11 icho.s (L192) x \$ 10,500 3 10mos 10,500 31 outher (Curr-Developer) (L392) 0 hours x \$ 11.68 per hr. ducational Assit (L904) k6 hrs. x 211 days = 362 hrs. x \$ 3.45 per hr. smi Assit (L905) n6 x 211 dys = 261 x \$ 3.45 per hr.	ndio -	Visual Supplies (C111)		. 4.		150
### CHOOL YEAR SEPT - JUNE ###################################	lesaro	on Supplies (S113)				150
## dector (L151) 1 6/12 22,795 11 1 10ho.s (L192) 2 \$ 10,500 3 10mos 10,500 31 0 acher (Curr-Developer) (L392) 0 hours x \$ 11.68 per hr. ducational Ass't (L904) 2 6 hrs. x 211 days = 3 62 hrs. x \$ 3.45 per hr. 3 7 7 8 8 3.45 per hr. 3 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	arent	Involvement Fund (Cli99)				150
1chs. a (L192) x \$ 10,500 3 10mos 10,500 31 outher (Curr-Developer) (L392) 0 hours x \$ 11.68 per hr. ducational Assit (L904) x6 hrs. x 211 days = 862 hrs. x \$ 3.45 per hr. smi Assit (L905) x6 x 211 dys = 261 x \$ 3.45 per hr.	CHOOL	YEAR SEPT - JUNE				
10ho.s (L192) x \$ 10,500 3 10mos 10,500 31 odeher (Curr-Developer) (L392) 0 hours x \$ 11.66 per hr. ducational Assit (L904) x6 hrs. x 211 days = 862 hrs. x \$ 3.45 per hr. smi Assit (L905) x6 x 211 dys = 261 's. x \$ 3.45 per hr.	irector	r (L151)	1	6/12	22,795	11,397
oucher (Curr-Developer) (L392) 0 hours x \$ 11.68 per hr. ducational Ass't (L904) x6 hrs. x 217 days = 862 hrs. x \$ 3.45 per hr. smi Ass't (L905) x6 x 211 dys = 264 's. x \$ 3.45 per hr.	10ho. 10	s (L192) ,500	·3			
x6 hrs. x 217 days = 362 hrs. x \$ 3.45 per hr. 30 smi Ass't (L905) x6 x 211 dys = 261 's. x \$ 3.45 per hr.	bucher D hours	(Curr-Developer) (L392) s x \$ 11.68 per hr.		0		615
smi Ass't (L905) 16 x 211 dys = 261 's. x \$ 3.45 per hr	x6 lins.	. x 211 days =				30,57.
	.6	. x 211 dys =				4,368
e. 4 dat. (1.610)	. 9 4	ist (L619)	1:	12/12	6.000	6,000
luc onal Research (chia)	luc o	onal Research (Chil) For Learning Inc. Morin Assoc.	-1		-,000	13,000
ne it (Ch12) da . \$ 100 por day da: \$ 100 por day	da .	. \$ 100 por day				Lco
Tiversity - School Of Cont. Educ. Tessionals x \$ 675 x 2 Semesters		19h) Liversity - School Of Cont. Educ				0 500
The Lyona of School of Education x 12 Crodits x \$ 63 per Credit		" 'vers y - School Of Education				10,

BOARD OF EDUCATION OF THE CITY OF BLW YORK, JA 266 OFFICE OF BUSINESS AFFAIRS BURBAU OF BEIMBURGABLE PROGRAMS PROJECT BUDGET 1971-1972

Fogram Rillnauel Borly Childhood Center District # 14

Euration of Program: July 1, 1971 To June 30, 1972 (12 menths)

1/16/71

1/18/71	-			
MONG MEAN DEATH - JAMES	jiumski;	AMOUNT OF	PROJECT COST	
brery Books (0131)			\$	325
xtbooks (0129)				200
actroom Supplies (C113)			- 4	,000
fice Supplies (C141)				i
dio Visual Supplies (C111)				
avel (0,05) Tesol Convention Texas Dir + 2 Trs. days plus Airfore + Local Expenses			1	,200
leege For Director + Teachers 12 fper (Ch21)		•		300
rfars For Para Professional (0421)				400
rent Involvement Fund (0199)	•			650
ront Snacks (Cl ₄ 95)		•		200
uipment (0399) Sewing Machines x \$ 50 Each				200
de - Tapo Recorder + Camera Comp. (0322)			. 3	,000
s. (C427)				200
leono Service (C439)				250
in g Services (Chl41)	\$			50
1. (C779)			1	,420
t rawing Supplies (C141)				246
of Security - (0740)			,	,817
\$ 2.10	1			100

Life Jury 30	2, 12/3, (12.)	mable)
NUMBER	AMOUNT OF	PROJECT COST
		\$ 1,635 - 4,350
	•	640
		1,120
		AMOUNT OF NUMBER TIME

100% Reimbursable
PL 89 - 10 As Amended - Title VII
Federal Funded

JA 268

rogramBillingual Early Childhood Coaber District # 11

Duration of Program: July 1, 1971 To June 30,1972 (12 antho)

5/2/71

: . BUDGET MODIFICA	ATION 11		
Trainec Professional (L916)	FROM	70	CHANGE
		· · ·	
1x2 hrs. x 29 doys=58 hrs.x \$ 3 per hr.	\$ 17/1	-0-	174
3x1 hrs. x 29 days=87 hrs.x \$ 3 per hr.	-0-		+ \$ 251
Trainec Kon-Professional (L912)	· · ·		
2x4 hrs. x 29 days=232 hrs. x \$ 2 per hr.	••0 -	+ 1,61,	+ 464
Classroom Supplies (C113)	4,000	3,41,9	551
			-0-

NO CHANCE IN MONEY

BUSINESS AFFAIRS
BUSINESS OF HUMBERS AFFAIRS
BUSINESS OF HUMBERSAMES CROSSAMS
PROJECT BUDGET 1974-1972

JA 269

. regram P'linguel Early Childhood Conter -- District 14

Duration of Program: July 1, 1971 to June 30, 1972

9/30/71			
BUDGI	ET MODIFICATION # 2		
*	FROM	TO	CHAUGE
Nacher Mides (1910) Fx 6 hrs. per day z 211 days Noth hrs. 大多.00 per hr.		\$15,192	went no
Greational Assistants (L904)			4\$15,192
pecreage from 7 to 4)	\$30,574	17,471	- 13,103
Model Security (6740)	1,817	1,926	+ - 109
Howalth (0707)	2,160 .	2,1,00	+ 240
Sustadial Conta (C456)	-0-	250	+ 250
fuition (Ch9h) (Para-Professionals)	10,800	9,450	- 1,350
Supervising Steno (L811)	1,800	-0-	- 1,800
Pext ooks (0129)	200 .	362 .	+ 162
Pelr one (Ch39)	250	550	+ 300
			-0-

No Chango in Money

PROJECT THE SET OF CITY OF A CAR. OFFICE OF EUROPESS AFFAIRS. PROJECT THE SET 1971-1979 PROJECT THE SET 1971-1979

PROJECT 0/32/12 COST BUDGET MODEFECASTON # 3 CHANGE FROM 50 consensy. 78 (c412) 500 5 Days x (100, per 60y · C --\$500 VIDEO - MARCH REORDER (c388) 3000 2500 - 500 SURPRON (eligh) 9450 8450 -1000 CIANGROOM SUPPLIES (c123) 31119 5449 42000

NO CHANGE IN MONEA

BOARD OF LICEATION OF THE CITY OF MEN YOUR OF BUILDING ARTHURS PROJECT BUILDING 1972 1972 PROJECT BUILDING 1972 1972

ourna hill ament Marry Chilana	of Conter - District 1	11	
puration of Programs July	1, 1971 to June 30, 197	2	
11/2/71			
Bungu	r HODII ICATION * 4	and the second s	
	FROM	70	CHANGE
Queational Research (C411)	\$13,000	\$12,000	- \$1,000
tonouttents (chi2) 20 days x \$50 per day	400	1,400	÷ 1,000
quipmont (0399)	200	200	-0-
Sewing Machinos	30	\$100	-0-

No Change In Money

10 AD CE LOTOTEOU CE THE CEST OF BUY 1 OFFICE OF EURISES AFFAYES BUSINAU OF RESIDENCES PROJECT BURGET 1971-1972

3/6

gram Bilingual Early Childhood Conter - Diction & File

Duration of Program: July 1, 1971 - June 30, 1972

12/27/71

1/2000-1001-22	FIGATION & 5 FROM	<u>TO</u> \$1,125		<u>Cuaria</u> \$1,125
Social Security (0740) Sr. Clerk 5.2% x \$6,000	\$1,638	1.950	+	312.
(Minus x \$83 x 6 credits)	7,968	7,470		1495
Director (L151)	11,397	10,565	_	832
Classroom Supplies (C113)	5,449	5,342	-	107

No Change in Money

100% Reimbursable Title VII

EGARD OF HEREALDER OF SAN OVER OF HAIR TORK OF RICH OF THE HEREALDER AND THE WOLD OFFICE THE HEREALDER TO SAN OFFICE

. JA 273

of Progress	July 1, 1971 - June 30, 1	072	
	BEDGE RESILIENTED ! # (0		
	Froi	20	C11/ 11711
Travel	\$1200	\$ 500	- \$ 700
Conferences + Expenses	Related - 0 -	cor	4 700
	Travel Conferences +	PUDGUT HUBITICATION # (0) FROM From \$1200 Conferences + Related 0 -	FRG1 FO Travel \$1200 \$ 500 Conferences + Related - 0 - 700

No Change In Money

100% Reimbursable PL 89-10 Federal Funded Title VII

TWOMEN BOTTOM THE TAIS

Duration	of Programa:	dury 1	, 1977 3) ma 30, 1972		
3/20/72				and the second second second second		
		BUDGLE I	CD1. ICATT	01# 6	0	
CODE			PROM	• • •	50	CH/ MAIN
(c 405)	Travel		. \$1200		\$ 500	- \$ 700
(c 406)	Conferences +	+ Related	-0-		700	+ 700
	,					- 0 -

No Change In Money

100% Reimbursable IL 89-10 Federal Funded Title VII

EDELAN OF RESTREED ASPAIRS PROJECT DUDGET 1971-1972

*	Billiogich	month.	Coll	Marid.	Conter	33 34. 404	
	11: 1 41: 116: 1-						

Duration of Program: July 1, 1972 - June 30, 1972

1/19/12

								ATTICK THE PARTY OF
	BUDGET MODIFIC	CATION # - 7 FROM	,	40			ciu	Mic :
(695).	Educational Research	\$ 12,000		\$3.3,000			+ \$	1000
(chop).		500	- :	750			+.	250
· (chó5)	Conferences + Related Expense	700		.: 950			+	250
(00.09)	Art + Pressing Supplies	2/16		. 295			.+	: 50
	Audio-Visual Supplies	500 .		. 603			4	304
	Classroud Supplies	5342.		1-56/12			+	30
	Tuition (Para's)	8450		6300	1.	٠	-	215
	Services Fot Otherwise Classified	-0-		13,5			+	50
(c493)	Admission Fees .	-0-		śco			4.	720
	Tuition - (Teachers)	7470		6972	1		-	1,9
•	Pupil Transportation	1/120	•	123.8		٠.	-	50
, , , , , ,								

No Change In Honey

100% Reimbursable Fund Foundation Title VII SUMMER COMPONENT

EXPENDITURE ACCOUNT NO. 1200 AIMINISTRATION

EXPRISE CLASS	NAME AND THRE, PURPOSE OR TITLE	PROJEC	T TPB	QUARTETY	SALARY RYMANA OR UNITY COST	EUDOSIAC AMBUAT
OFFICE SUPPLIES:	Office Supplies					\$ 100.cc
	Office Supplies Telephane Services			The second secon		100.00
				AT THE PARTY OF TH		
						JA 276

COSTR CERCIENT

EGENTIANS ACCOUNT NO. 200 INSTRUCTION

EXPENSE CLASS NAME AND TITLE, PURPOSE OR TITLE	PROJECT	TIDB TASE	CATASILA	EMANI ECOTAL CO. UNIT CUMP	2000
SALARIES:					
PROFESSICNAL: Teachers (4)	gen en	×	4 x 73 >	12.22/hr	\$ 3,803.
NON-PROFESSIGNAL: Discational Assistants (4)		ж		3.92/25	2,500
Family Assistant (1) MATERIALS:		×	1 :: 96' hr	3.63/	5 X X
Andio Vicual Suppli s Instructional Sapplics					JA 27
					7

EXPENDITURE ACCOUNT NO. 200 DISTRICTION

EXPENSE CLASS	NAME AND TITLE, PURPOSE OR TITLE	PROJECT THE FULL PART	QUANTIES	SALADY RESTAL OR CHEE COST	200000
OTHER EXPENSES:					
Parent Invol	vent	COLUMN TO THE PROPERTY OF THE	CLUSTY VOTO TO PROPERTY OF THE		1,0.00
					A 278

EXPENDITURE ACCOUNT NO. 500 PUPIL TRANSPORTATION SERVICE

EXPRISE CLASS	NAME AND TITLE, PURPOSE OR TITLE	PROJECT TIME FART	CUMITITY	SALIRY RESTAL CR CGIR COST	FURNITE
TRIPS:			The property of the property o		200.
			The real property of the case		JA 279

THE COLFORDIT

EXPERDITURE ACCOUNT NO. 800 FLEED CHARTES

		and the spherical property and the spherical property of the spherical			
EXPERSE CLASS	NAME AND TITLE, PURPOSE OR TITLE	PROJECT TIME FULL PART	CAVILLIA	EALITY TEXT/L CR UNIT COST	PUDIETTS AUGUST
Social Socurity (pa	ra-professionals)				223.00
					\$

6/

173

			20	•
•	political of	CHANGLACTOR	4,000 213	,
			" " " " " " " " " " " " " " " " " " "	
	(Second Second			
4. 4	and a street in the treet of the	ers, Cars, state, and FIF Code.	total inpole	
			0EG-0-70-347.	2
	Hew York City Exard of F	Mention for	S. televisian I Marria	
	Community School bistric		5000330C	
	110 Diginester Street		a. Aleman	
	Brooklyn, How York 1120	۷	; 120,763. (
		· · · · · · · · · · · · · · · · · · ·	S. Phinos Ca Shar	of externa leaves
. KE C	NECK - DAZZARIA TO.		illustrated	37.20775
	New York City Board of 1	ducation	TOPATE ANAMOS	
	Brooklyn, Few York 1110		17.1.1 111.4	
3201				
., .,		1 6		i
	Bilingual Losly Childho.	d dence for cals parro	c.	, '
	<u> </u>		and the same of th	
	or wark Andles sective condition		3	
1	Scope of Unrh: Ar set of	out in the existing grad	it decument and no	diffed by S
	above included herein by	reference and the appr	roved budget of 7	pages
	attached hereto except t	that the grantee underst	tands that any amo	unt in exce
	of \$ 123,765. this extension is to be	, appearing in the re	ervauer famle rese	innely ob-
	ligated under the grant	or from new-Federal fu	eds to be supplied	by the son
	and that in the event of	ich additional funds ar	e needed and not m	ade availab
	the grantce will revise	and submit for the gra	nts officer's appr	oval a bude
	modification conformable		e within 30 days o	f Its knowl
	of such reduced funds as	vallability.		
1,	Special Conditions: Ef	feetive from the dare of	f sterature in Blo	ek 12 below
E.	the grant is modified by	y the application of ap	ecial grant terms	and condition
	numbered 1 through 8 at	tacked hereto and any a	dditional requires	ents made.
	applicable to the grant	by virtue of their pub	Heatlen in the Co	de of Felar
	Regulations, 45 C.F.R.	123.1 through 123.32 cf	feetive prior to c	meention of
	this amendment.		i	
c.	Additional Technical Re	and compared. The grant of	a further understa	onder that if
٠.	responsible for carryin	e out the following add	itional technical	reguirement
	None	(, e.e. e.e. 7,023,0 % 2.0),		
C 4- 414	THERTUA			
20	U.S.C. 880 h-3. (a)	CAM: 2002878	APP. 7530	292 .
		DIVONINA		
1. 1. 4.	OF GRANTS OFFICE HELPhone types		12. DATE	

John H. Getreu

TE SCHAFORE OF AUTHORIZED COVERNMENT OFFICIAL

THE PROPERTY PORTER

: : : : : : : : : : : : : : : : : : :	CARRELL CONTROL DILLUTUAL SOUCATION ACT, TITLE VII, EN CONTROL DILLUTUAL SOUCATION ACT, TITLE VII, EN CONTROL DILLUTUAL SUMMARY/EXPENDITURE REPORT				2.h. (P.L. 90-247)		PLEASE NEAD HISTEUCTIONS DEFONE COMPLETING THIS FERM		0.11.6. No. 5.11.6.17	
		****		~~~	PRODUCT NE	ocit .	GANT NUNG	Gis	STATE	
b 14., 21.	o Crash	Pirst St	ect, Buny	n, M.Y.	1:00530		OEG-0-70-31,72		How York .	
	rrus situi		Check Com	operan tubbl an desall e-kad	Circle Contact			ted experientant hereat experientant hereat		(1/30/2)
1. 1. 4.	<u> </u>		A F 1 1 1	LAPENS	CLATTO .C	710%	-;		TOTAL	NEGOTIATED
111111	1:75.3		l sex-	STRVICES	ALATERIALS ALD SUPPLIES	TRAVEL	EQUIPMENT	SXPENSES	EXPENSITURES	BUDGET
7,*	1 .:-	1.08 ESSIONAL (2)	AHORESSIONAL (+)	i 755	(1)	(°)	(8)	[9]	(10)	an .
	140	1		5	\$ 150	:		500	950	1 950 -
	2.25	(1) 2(1) =	Z 220 -	1.600	3.075.	_3_000~		500,	227,341,7	
	1 219		1		-23-: 5-6				מיייים ביייים ביייים ביייים	101,011,
	4.0				i		1.			
	1 539			1,000					2,000	1,000
	5.5	1						•		
	7.2		1							
	::=	ja lae.	10.203						21 707	21 707 00
· / 1	7.2	,		;					-	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
; ·'	11175		1				1.			
	.:N	1		!			. : ·			\
t	1::::									
,	11.10		1	1			1			
	::L	71,652	62,007	5.620	3.705.	: 1,000.	\$	³ 7,000	11/5,CM	
·: 5		:	:	:	3	:		3 .	Telegraphic.	: 245,700

. 1741. 1913 - 1914

THE ACCION NO. 100 AMERISTRATION

 MAND AND TITLE, PURPOSE	PROJECT	TOME PARE	QU.WITITY	CALARY, RENTAL OR UNIT COST	derectural description of the contract of the
Code Supplies Postage Polophone					\$ 300.00 150.00 500.00

200 - 2578

CONTROL NO. 200 INSTRUCTION

: ethss	NACE AND TIME, PURPOSE	PROJECT	Trace	COUNTILL	CALARY, REMITAL OR UNIT COST	FUDALTED AMOUNT	
:					• • • • • • • • • • • • • • • • • • • •		
TRITTE	Inter a contract of the contra		1				
C	servinator (beacher assigned)			1	30 050 00		
	.S.L. Peacher	x .			19,250.00	\$ 29,250.00	
9	.S.I. Teacher	х.		1	14,250.00	16,500.00	. !.
٥	urriculum Coordinator	25		2 .	10,250.00	10,250.00	5
						10,250.00	
2	mior licasgrapher .	*		1	8,000.00	8,000.00	
	asher Aida -	x		1 x 220 x 5.	3.1:2/hr	1:,139.00	
	measional Assistants	х	•	7 × 220 × 5.	4.10/hr	.34.727.00	
	rily Assistant	x		lx 220 x 5.4	4.01/hr	1,853.co	
				•	e/5~	284	
		.				•	
e mate:				*.			1
oquals 22	O working drys per school year		•				
	The state of the s						

SCHOOL WEAR 1973 - 1971: EMPEROTTURE ACCCUNT NO. 200 INSTRUCTION

	EXPENSE CLASS	NOW AND TITLE, PURPOSE OR TITLE	PROJEC FULL		- Current	CE CONES ENTARY S.YEARY	EUDSOTÉD Alicono
26	Evaluation			<i>\(\)</i>		0	
		versity (professionals)		•	60 0100.	85.00/ere	2,000.00 5,100.00
M	ATTRIALS AND SUPPLIES Textbooks						
	7. Instructiona Audio Visual						2,000.00 3,000.00 ∴500.00.\$
	Total Common empences - Co	don (oir fare and related ordinator and suc teacher)					20 20 27

THE ASSERTING NO. 2000 INSTRUCTION

CORD NUMBER OF THE PURPOSE FRONCE TWO QUANTITY CHART RESTAL FUNCTION AND WHAT COST AND							
Including June 10th University 18 and. 50.00/ered. 1,620.00 Temberia Tem	c: +33	MANN AND SITE, PURPOSE		QUANTITY .	SALARY, RENTAL OR UNIT COST		
Including June 10th University 18 and. 50.00/ered. 1,620.00 Temberia Tem		TO CALL THE CONTRACT OF THE CO		· ····································		,	
Temberks Tember		100:	i				•
Temberia Temberia Temberia 1,000.00 1,800.00 155.00 155.00 1,000.00 155.00 1,000.00 155.00	:	militaria				\$ 3,000.00	• •
Temberks Temberks Thotreprional Materials 1,800.00 1,800.00 1,500.00 1,500.00 1,500.00 1,500.00 1,000.00 1,000.00 1,000.00 1,000.00 2,000.00 2,000.00 3,000.00 3,000.00 3,000.00 4,000.00 5,000.00 6,000.00		ion land University		18 ored.	90.00/erod.	1,620.0p	
Temberks Incorporational Materials India Visual Compliant Local Convention (air fare and relative and relative and one teacher) Parent Involvement Fund 1,000.00 LETTING: Parent Involvement Fund							
Instructional Materials Linite Visual Supplies Local Convention (air fave and relate expenses - Coordinator and one teacher) Linite Visual Supplies					i		
Applie Visual Supplies Lag.co					1,000.00	~!·	
Jacob Convention (air fave and a late companies - Coordinator and one teacher) Jacob Coordinator Jacob Coordinator A 286		Lorrational Materials				1,800.00	/
JA 286 Parent Involvement Fund	:	Mile Visual Amplies				455.co	
Parent Involvement Fund 2 Amont Involvement Fund 2 Amont Involvement Fund						•	
The Appendix - Coordinator and 1,000.00 1,000.00 2,000.00 2,000.00 3,000.00 6							
Parent Involvement Pard 500.00 7. 500.00		lett commisses - Coordinator					
Parent Involvement Fund 500.00 66		na cho teacher)				,1,000.00	
							A
		arent Involvement Fund			4: .	. 500.00	286

10 W. W.J - 1744

THE ACCOUNT HE. 500 FUPIL TRANSPORTATION SHRVIOR

	NAME AND TITLE, PURPOSE	Phoj	HCT THE	CANNILLA	SALARY, RENTAL CR UNIT COST	INDOETED
arris:						
3	cheel bus brips for trips for ultiment purpose	5				
						\$ 1,000.00.
				•		
				And the second s	·	
						VA 2
	· · ·					287
					:	

17:3 150 - 1514

THE AND THE MO. 600 FIXED CHARGES

. 01.100	KNS AND TITLE, PURPOSE	PROJEC	TIZIN	QUANTITY	SALARY, RENTAL OR UNIT COST	. RUDGETED
F ENTERING	:					
noticials:	tirement -					
	Thin Annity Fund					1,00.00
ive	line			. 4*		960.00
Sc Lincipal Control	cial Scenrity					2,559.00
	Core					21:0.00
Fer	rica.	3				250.00 1,461.00
Dad Supplient	inl Security		4			1.80.co
	ial Security				₹ \$*	2,637.00.
	Caro :				``	2,160.00
		4 .				1

EXPENDITURE ACCOUNT NO. 800 : FIXED CHARTES

					•
EPEISE GIASS	HAVE AND TITLE, PURPOSE	PROJECT TIME FOLL PART	CUANTILY	SALUTY RESTAL CO UNITY COST	ENDGETED AMOUNT
Para-profession Social Health Welfar	l Security				3,233.00 2,00.00 3,00.00

EXPENDITURE ACCOUNT NO. 200 INSTRUCTION

EXPENSE CLASS	NAME AND TITLE, PURPOSE OR TITLE	PROJECT TIME FULL PART	CUARRITY	SYLARY CATHER STATES	Milorriko Ancini
CTHER EXPENSES: Parent Invol					500.00 JA 290

OFFICE OF REMADURSABLE PROGRAMS

BOHOOL DISTRICT 14, DILDORLYN

BIO SOUTH FIRST STREET BROOKLYM, NEW YORK DAM

The project coordinator, professional resource people and secretarial and clerical personnel will all be assigned to a central location and be involved in all components of the Title VII project. Professional resource personnel (whose specific doties are outlined in the project application) will be responsible for the effective implementation of all aspects of the instructional program. All Title VII personnel will be employees of and solely accountable to the Local Education Agency.

A tentative schedule of personnel assignments follows below:

P.S. 122 P.S. 122 For Saviour	P.S.122	P.S. 172	Thursday StaireterGraul/ United Tal.	
	•			
Dar Saviour	Par Saviour		United Tal	inited Tal.
Our Saviour	or Saviour			
		Beth Rachel	P.S.122	leth Rachel
P.S.122	P.S. 122	P.S.122	P.S.122	r.š.122
Dar Savioar	us. Ther t	Our Saviour	Car Saviour/	Dur Savieus
	Paul		Sts. Petert Paul	its.Peters:
teth Bachel	inited Tal.	Dath Eachel		both Bachel,
· P.S.122	P.S.122	P.S.122	Sts.Peter&Paul	its.Peterara
Dir Saviour	Por Saviour	Beth Rachel	Beth Rachel	r.s.122
	our Saviour Seth Rachel P.S.122	Paul inited Tal. P.S.122 P.S.122	Paul Bath Bachel P.S.122 P.S.122	Paul Cur Saviour Cur Saviour Cur Saviour Sts. Petert Paul Seth Backel Inited Tal. Bath Backel Beth Backel United Tal. P.S. 122 P.S. 122 P.S. 122 Sts. Petert Paul

The project coordinator will be required to lisit all live sites on a regularly acteduled basis.

TITLE VIL SITES	Educational	Ass't	s/Teacher Aides	. Family Mocke	rs/Farfing
P. S. 122		10		1	,
- Balted Talmidical		5		7 1/2	
Solats Peter and Paul		_2		1/2	
Car Saviour	·	8		. 1	

CTRICE OF SUSINESS AFFAIRS DUREAU OF DEIMBURSABLE PROGRAMS PROJECT BUIGET 1973-1974

pa .	eation of Program: Sentenber 2074 - dor		
		FROJ	
** who n ,	Tace 2		
(0740)	Social Security-5.85% x \$390,468	\$ 18,104	
(0707)	Health-53 x 4960 2 x 4300 .	1.9,630	
(0741.7	Welstere-9 x \$370 14 x \$340 2 x \$270	18,830	
(c405)	Trip-TANOL Convention	. 744	
(0450)	Conf. & Related Expenses .	256	
(0337)	Textbooks/Northooks	19,000	
(0137)	Instructional Supplies .	12,000	•
(0133.)	Audio-Visual Supplies	. 5,857	
(@00)	Office Supplies .	3,000	
(01:20)	Terent Involvement-5 Sites x \$250	1,250	
(2402)	Telephone	1:00	
(0401)	Carfurs	350	
chip)	Consultrats-12 Gausions x \$50 per	600	
10.1)	Evaluation(Contract)	8,930	
,20)	Non-Prof. Traince-Wh x 19Hrs. # 528Hrs. x \$2.00	1,056	
(245)	Trov. Traince (TH) 8 x likes. # 95Mrs. x \$3.00 Cost of Program G.17% Indirect Cost Total Grant	203 {457,074 23,157 {46,431	•
297	3005 Reinbergoble-Title VIT-10FA 3-1974 Berellante \$ 19,000 EXHIBIT "E"		

APPLICATION FOR PEDENAL APPROXIMENT	D. DORE CO STREET & RESTREET
(NONCONSTRUCTION TROOPANIS)	
PART I	2. A COUCAST S ALL CONTROL NUMBER
S. I CHERAL COMPLOY ACTINGY	IR (3019/8).
	A. APPLICAGE BARL
U.S. Office of Education (Tellingual Education)	TEST YOUR COLD DOWN ON TOMOURIES
ORGANIZATIONAL UNIT	DEPARTMENT DIVISION
Application Control Center	1
ADMINISTRATIVE OFFICE	COVERNITY SOUDCE DISTRICT #14
***	STREET ACCRESS - P.O. LOX
400 Maryland Avenue, SW	250 CONTENT TO COMPANY
STREET AUDILUS - 17.0. LOX	Sin South Past Sirser
Weshington D.C. 20202	COUNTY
CAT Y	PROCEERII, NEW YORK KINGS
STAYE ZIP CODE	57678
S. DESCRIPTIVE NAME OF THE PROJECT	NEW YORK 11205
Bullingual Early Childhood Center	
& FEDERAL CATALOG HUMBER	7. CE BEPAL FUNDING LEQUESTED
13.403	
6. GLERTEL TYPE	15,231.00
	Doard of Education
STATE. COUNTY. CITY, X	Local Education Agency M.Y.C.
2. TYPE OF APPLICATION OR REQUEST	
	Pout in 1 to 1 to
HEV CRAUT	Revised Amended
P. TYPE OF ASSISTANCE	Revised Amended Nothing Changes (Specific) Budget
P. TYPE OF ASSISTANCE	Revised Amended Nother Changes (Specify) Budget
D. TYPE OF ASSISTANCE	X OTHER CHANGES (Specify) Budget
O. TYPE OF ASSISTANCE CONTINUATION, SUPPLEMENT. CONTINUATION, SUPPLEMENT. CONTINUATION, SUPPLEMENT. CONTINUATION, SUPPLEMENT.	X OTHER CHANGES (Specify) Budget
D. TYPE OF ASSISTANCE CONTINUATION, SUPPLEMENT. LOAN, OTHER (Specific) L. POPULATION DIRECTLY BENEFITING FROM THE PROJECT	X OTHER CHANGES (Specify) Budget
GETHY. LOAN. OTHER (Specify) 1. POPULATION DIRECTLY BENEFITING FROM THE PROJECT 1. 716	D. LENGTH OF PROJECT
CONTINUATION. SUPPLEMENT. O. TYPE OF ASSISTANCE GETHY. LOAN. OTHER (Specify) 1. POPULATION DIRECTLY BENEFITING FROM THE PROJECT 2. TORS RESSIONAL DISTRICT	Nevised Amended Budget 10. LERGIN OF PROJECT 10. Months
CONTINUATION, SUPPLEMENT. CONTINUATION, SUPPLEMENT. CONTINUATION OF ASSISTANCE LOAN, OTHER (Specify) LOAN, OTHER (Specify) LOAN, OTHER (Specify) CONTINUATION DIRECTLY BENEFITING FROM THE PROJECT CONTINUATION DIRECTLY BENEFITING FROM THE PROJECT	13. LENGTH OF PROJECT 10. Months 14. BEGINNING DATE
CONTINUATION. SUPPLEMENT. C. TYPE OF ASSISTANCE CONTINUATION. SUPPLEMENT. LOAN. OTHER (SHEETLY) L. POPULATION DIRECTLY BENEFITING FROM THE PROJECT L. 236 C. CONSRESSIONAL DISTRICT C. 14 L. 28	Nevised Amended Budget 10. LERGTH OF PROJECT 10. Months 14. BEGINNING DATE September 1, 1974
CONTINUATION. SUPPLEMENT. C. TYPE OF ASSISTANCE CONTINUATION. SUPPLEMENT. LOAN. OTHER (SHEETLY) L. POPULATION DIRECTLY BENEFITING FROM THE PROJECT L. 716 C. CONSRESSIONAL DISTRICT C. 14 L. 78	13. LENGTH OF PROJECT 10. Months 14. BEGINNING DATE
CONTINUATION. SUPPLEMENT. O. TYPE OF ASSISTANCE GRANT. LOAN. OTHER (Specify) I. POPULATION DIRECTLY BENEFITING FROM THE PROJECT 1,776 2. CONSPESSIONAL DISTRICT 6. 14 6. 14	Nevised Amended Budget 13. LERGIN OF PROJECT 10. Months 14. BEGINNING DATE September 1, 1974 5. DATE OF APPLICATION
CONTINUATION SUPPLEMENT. CONTINUATION OF ASSISTANCE LOAN, OTHER (SMERITA) LOAN OTHER (SMERITA)	Nevised Amended Budget 10. LERGIN OF PROJECT 10. Months 14. BEGINNING DATE September 1, 1974 15. DATE OF APPLICATION February 19, 1974
CONTINUATION SUPPLEMENT. CONTINUATION OF ASSISTANCE LOAN, OTHER (Specific)	Nevised Amended Budget 10. LERGIN OF PROJECT 10. Months 14. BEGINNING DATE September 1, 1974 15. DATE OF APPLICATION February 19, 1974
CONTINUATION. SUPPLEMENT. C. TYPE OF ASSISTANCE CONTINUATION. SUPPLEMENT. LOAN. OTHER (SHEETLY) L. POPULATION DIRECTLY BENEFITING FROM THE PROJECT L. 716 C. CONSRESSIONAL DISTRICT C. 14 L. 78	Nevised Amended Budget 10. LERGIN OF PROJECT 10. Months 14. BEGINNING DATE September 1, 1974 15. DATE OF APPLICATION February 19, 1974
CONTINUATION SUPPLEMENT. CONTINUATION OF ASSISTANCE LOAN, OTHER (Specific)	Nevised Amended Budget 10. LERGIN OF PROJECT 10. Months 14. BEGINNING DATE September 1, 1974 15. DATE OF APPLICATION February 19, 1974
CONTINUATION. SUPPLEMENT. CONTINUATION. SUPPLEMENT. CONTINUATION DIRECTLY BENEFITING FROM THE PROJECT 1,736 CONSRESSIONAL DISTERCT THE APPLICANT CERTIFIES THAT TO TO MEST OF HIS ENGINEED CORRECT, AND THAT HE WILL COMPLY WITH THE ATTACHED ASS	Nevised Amended Budget 10. LERGIN OF PROJECT 10. Months 14. BEGINNING DATE September 1, 1974 15. DATE OF APPLICATION February 19, 1974
CONTINUATION. SUPPLEMENT. CONTINUATION. SUPPLEMENT. CONTINUATION DIRECTLY BENEFITING FROM THE PROJECT 1,736 CONSRESSIONAL DISTERCT THE APPLICANT CERTIFIES THAT TO TO MEST OF HIS ENGINEED CORRECT, AND THAT HE WILL COMPLY WITH THE ATTACHED ASS	Nevised Amended Budget 10. LERGIN OF PROJECT 10. Months 14. BEGINNING DATE September 1, 1974 15. DATE OF APPLICATION February 19, 1974
D. TYPE OF ASSISTANCE	Nevised Mannes Budget 10. Length of Project 10. Months 14. Beginning Date September 1, 1974 15. Date of application February 19, 1974 OGE AND BELIEF THE DATA IN THIS APPLICATION ARE TRUE A URANCES IF HE RECEIVES THE GRANT.
CONTROL CONTINUATION, SUPPLEMENT. CONTROL CONTINUATION, OTHER (Specify) LOAR, OTHER (Spec	Mevised Mannes Budget 10. Length of Project 10. Months 14. Beginning date September 1, 1974 15. Date of application February 19, 1974 See and belief the data in this application are true and discussif he receives the grant.
D. TYPE OF ASSISTANCE CONTINUATION DIRECTLY DENEFITING FROM THE PROJECT 1.776 2. Conspessional distinct 4. 14 5. 14 CORRECT, AND THAT HE WILL COMPLY WITH THE ATTACHED ASSISTED HAND THE WILL COMPLY WITH THE ATTACHED ASSISTED HAND.	Mevised Mannes Didget Dilength of Project 10 Months M. Beginning Date September 1, 1974 S. Date of Application February 19, 1974 Def and belief the Data in this Application are true a URANCES IF HE RECEIVES THE GRANT.
CONTROL CONTRO	Nevised Amended Dudget Duck Electron of Project 10 Months 14. Economic date September 1, 1974 September 199, 1974 Dec and belief the data in this application are true a convenies if he receives the Grant. Telemone number ty crintendent Telemone number Cold Number Telemone number
THE APPLICANT CERTIFIES THAT TO THE ATTACHED ASS CORRECT, AND THAT HE WILL COMPLY WITH THE ATTACHED ASS PED HAME WIDDIAM A. POWER Supplement. Continual:	Novised Amended Budget 19. Length of Project 10. Months 14. Bechning date Soptionbor 1, 1974 15. Date of application February 19, 1974 OSE AND BELIEF THE DATA IN THIS APPLICATION ARE TRUE ADDRANCES IF HE RECEIVES THE GRANT. TELETRONE HUMBER CONTINUE NUMBER 212 963.4800

PART III - BUDGET INFORMATION

er den in en menten en en menten en e	the side talls compared the secondary of the compared talls from			BODGELIN					-
CHANTINGTON		T FSS		A - BUDGET	the rate of a semigraphic different	I ·	NEW OR REVISED DU	DGET	-
GRANT PROGRAM.	CATALOS NO.	FLD	HAL .	NON-FYDE		FEDERAL (*)	NON-FEDERAL	TOTAL (2)	-
bilingual Education	13,403	19,000				\$467,231.00	s	\$ 486,231.00	_
									_
									_
·		-						\$ 486,231.00	_
. TOTALS		19,00		5		3467,231.00	s	\$ 400,231.00	_
pulsy secretaries in a consequent restriction for secretaria a personal secretaria in the consequence of the				- BUDGET		ORIES			-
S. DE LECT CLASS CATEGORIES	Billings	al Ed.	(2)	(2)			(4)	(3)	_
6. 313538501	308,001	.00	5		\$	8	s	s	_
E. FRINGE BENGFITS	83,272	.00							_
c. YHAVEL	1,000	.00	_						_
e. ecurpset					.				
e 3000CS	33,628	3.00	-					_	_
A CURTRACTUAL	8,980	.00	_		-				
. C. CONSTRUCTION			_	••			_		_
N. OTHER	2,600	0.00		·	_				
N. TOTAL DIRECT CHARGES	457,978	5.00							_
1. NO ALCT CHANGES	28,25		-						
k. 707 vb8	4 456,23		*				ļs .		
T. PASS VAR DECOME	1 186,83	1.00	5		5		\$	1:	

JA 295

7.00 \$13	21,557.00 21,557.00	s 380 QUARTER \$ 121,557.00	4TH QUARTER \$ 121,560.00
7.00 \$12	21,557.00 21,557.00	\$ 380 QUARTER \$ 121,557.00	4TH QUARTER 5 121,560.00
7.00 \$12	21,557.00 21,557.00	3RO QUARTER \$ 121,557.00	4TH QUARTER 5 121,560.00
7.00 \$12	21,557.00 21,557.00	3RO QUARTER \$ 121,557.00	4TH QUARTER 5 121,560.00
7.00 \$12	21,557.00 21,557.00	3RO QUARTER \$ 121,557.00	4TH QUARTER 5 121,560.00
7.00 \$12	21,557.00 21,557.00	3RO QUARTER \$ 121,557.00	4TH QUARTER 5 121,560.00
7.00 \$12	21,557.00 21,557.00	\$ 121,557.00	, 121,560.00
7.00 \$12	21,557.00 21,557.00	\$ 121,557.00	, 121,560.00
7.00 \$13	21,557.00		
		s 123,557.00	, 121,560.00
		s 121,557.00	s 121,560.00
TOAL FUNDS NEE			
11/10 1011001101	DED FOR BALANC	ING PERIODS (Years)	Fifth
FIRST	(c) SECOND	Caint (b)	(e; FUURTH
s		s	\$ 486,231.00
	and and a I have a desired all and a second desired		
>		5	5
	3	>	FORMATION (attach additional sheets if necessary)

Et. Circor Changes See Attachments

12. INC. COT CHARCES: See Attachments

21. HT VACKET

PART IV - PROCRAM MARRATIVE (attach per instructions)

rest Livi

																	-
								021 1	(2	441 .	(21 1	((:	· i	01.2	<i>i:</i> i :	
		F!LS- 2	CATEGER	::::	GAT I CAT I	2A 193A CAT 2 CAT 2	CAT 3	CAE 6 CAT 1	C 1 1 2	CAT 3	CAT I	CAT Z CAT Z	AN ING CAY 3 CAY 3	Carta a CAT 1	(3-13CL (21 Z (21 Z	11r 1r 11r 1r 11r 1	20
		. i .					BBC - 00 - 00 - 000 - 00- 00-										
: - : <u>:</u> : :	(CT)E -	::T-I	TCTALS.	C A T - 3 -	<u> </u>	5	194	151	÷ :	551	15	6	E	c		5	-
	.4.71	:7:	134	7∴ €			718.71										
		16.9%		70.12	5:63	c.0:	0.0%	0.68	.0.05	0.04	0.0%	0.03	C.C2	0.62	0.03	6.63	
٠٠					4 ************************************	2	- 8.19-	340			7.93		1.32	0.45	:.31		
	10000			43.51	5 2.42	0.31	Casi	\$3.52	Ç.32					1.c c.éq			
			C. C.	c.cx	45 12.52	-14:63			0.32	5.34		3.04		-:::			
	100.01	19.32	14.12		6.63	0.0:	0.04	0.04	C.S.	0.04	0.63	0.00	0.01	6.61	c.c:	c.c:	_
	· · · · · · · · · · · · · · · · · · ·		200			-:.::	43 2.93	19.22	T14142		4.00	3.67	3.72		- 0.10		
		42.77	11000	35.11	2.45	3.03	0.08	C.02	6.(5	0.03	5.65	0.00	0.02	c. (2.63	2.2	_
							904 53.3%	7552	772.71			6.32		7.03		::	
	v.:		5.23	22.21		0.00		0.04			0.03	6.63	6.01	c.c.	c.:3	:	-
						0.00	21e			- 35.13-	27	1.53	24 3.43	· · · · · · ·	1.64	, ,	
		12.77	15.12	71.11	1.12	0.09	6.12	0.0.	0.08	- C	0.4	6.15			. ε		

- hi

7

			1.2 (1.5)	:		147 3. 147 3.	slic (213	1.41 1	111 2	FICAL CAL 3 CAL 3	CAT 1	1 . 1 .	ALTE.	(1) (1) (2)	(1.1 2	1 . 1 . 3	
	-11 07 6	A 1500×1	CATEGUR ES	123	TCAT 1"	C 17 2 CAT 2	CAI.3 -	C 2 T I	2 143 C 143	CAT 3	6-1 1	L=1 -	1-1.1 =	Cinck (C71.5	27-3	2+1.
	1 14 . 645	<u> </u>															
1 144		(.T-)		(41-3-		С.	401										
	273	31	14	527	C.78			3.5%	_1:77	12.72	- C.C3	c.z:	1.25	3.75	2.24	-2.51	
		3.64	2.41	52.08	5.34	0.01	5.34	c.28		0.54					- 2 C.3.	4.41	
.: .	1007	7.3			18 1.84-		60.50		0:53	315	3.37				·	- c.si	
		7.18		62.22-	C. C.	C.08	C 4 C %	6.01		0.68		0.03	6.64			c.:2	
- }.		762	71.5	354 -		- 0.51-	102	-34.35 -34.35	235 TIBUAT	479	5 3.42	17	2	C		1	
			14.77		0.00	2.0%	0.01	0.03		3.63		0,00	3.64	c.c:		5.08	
		······································			-:::	:.:	- 323		12	114			21	<u>_</u>		2	
	- :::::::	7.11	:::	- 65.57	6.000	0?	C.45 *	پَد.ه	0.01			0.64		0.34	C.33	c.st	
	. 					31:5	156	202		456	3.33	S.	5	-3.25	-5.51-	;	_
			-10.47-	-41.54-	c.69	0.01	C.C?	0.08	0.6%	0.01	0.03	6.00	0.00	3.64	C.C.		C A
		151	.20	476 •	7	0.0	100	164	104	335.		-			•		298
•	- :	74.1	15.52	-46065		C. C 1	6.21	0.03	0.67	 a.cx	n 1.						

	/ 4								L.		LAYLUÍ					
. 57	0 2 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6	UP FILS→75 376C631E	CATEGORI S	188	11343 1 143 1 145	SE SESA CAT 2 CAT 2	C 142	CAT L	CAT 2	CAT 3	CAT I	ISH CHO CAT 2 CAT 2	ARIAC TATE	CAT I	CAT 2	CAT 3
	28 CF FL.	2115-73	CATEGORI S	<	17:51	At. SPEA	6136	1340	X SFEAK	ING CAT a	FRE	ACK SPE	48 11.0 CAT 3	CATT	1048-40.	1Sh SFEER
11:15	_14 _ L19	LL 1														
-21	- 3342E-		-[CT4LS	-021-3	- 5.78	5	505 -51162	61	26	214 -21.52		2	3.5	C	C	5
	100.01-	- 12.22	7.25	786 78633	16								6	C.63	ε	
.:		277	71	53.9		-3.02	23.31	159	67	315		4 			-0:03	
	-:=::::::::::::::::::::::::::::::::::::	31.22	2.25	- ecîši	0.04		6.03		0.01	0.03	0.02	6.63	6.53	C.24		1.72
-4.3		7:		547		6.6%	363	15.75	43 0132	25C	0.34	4	2			
	· · : : : :	15.43						0.00	2.04	0.5*	3.02	<u> </u>	C.(2		0.04	C.31
:	 (!:	175			2.47 	0.23.1 	327	163 	55 6142	-50.26-		3.4	-5.21	3. c i ;	5.27	
							C.34									
			-, 11				173									··· - c
					9.63	0.54	163	26.	4.64	0464	0.02			<u> </u>		
	y,1							30								

L	627 1	TOTALS	cat-a-						· · · · · · · · · · · · · · · · · · ·						
1243	354	124	7!4	15		156 	24.75-	112	464	3C 2.44	15 1.2%	ξ.εί	1.1	. ć.51	-1.3
133.55	31.73	-1:.2:-		······ c :		3.13			1	C	:	(
			456	3.75		Z5.51	104	46	213	5.4%	-5.53	5.45	3.55	C	
:5.53	31.27	-6.35	-61.44		3.0%	6.01			0.04	c-					
£12		20	777	-3:62 	0.00	-64.64	4 <u>- 4 2</u>	20	216			2		- ::::	-:::
:::::::			-:::ii- 	3,52		6.68		5	C . (!			1			
13423	<322	2:25	17/12		74	5802 29:5%	2751 -19100-	1700 9.0%	34.77	207	0.5%	1.24	5.24	5.1:	3.3
::.::			-:::5	0.20	2	1-11	- c	6.64	3.0%	0.64			24	7:-	C.3

in the contract of the contrac	The said the	710 10 (610 F102); (71 1 0/1 2 0/1 3 (71 1 0/1 2 0/1 3	641 1 (24 2 474)	(a) (a) (a) (a) (a) (b) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c
	aLlax \$9377186 U.T. T. Call 2 Call 3 Call Call 2 Call 3	CACER SPEAKING CAT 1 CAT 2 CAT 3 CAT 1 CAT 2 CAT 3	FRENCH SPEARING CAT 1 CAT 2 CAT 3 CAT 1 CAT 2 CAT 3	CAT 1 CAT 2 CAT 3 CAT 1 CAT 2 CAT 3
7-107_14 _LINEL 2				
1442 LS 5 1442	15 0 1039 		0.02 0.01 0.41	- 0.01 - 0.01 - 0.01 -
		C.d: C.d: 0.0x	0.00 0.00 0.00	C.CR C.CE C.CE
1125 236 113 277		207 74 641 70134 5165 48148	16 13 2	—a.a. —a.a. — a.a. —
120.00 - 120.00 - 10.00 - 10.00	- 0.11 0.14 C.05	0.00 0.00 0.00	-c c.cc c.c:	G. 14 G. 12 G. 124
		113 71 856 0.33 5187 09144		
	C.C. C.S. 2021	0.00 0.00 0.00	0.22 0.62 6.22	: C.2
· · · · · · · · · · · · · · · · · · ·		41.72 3.32 62.23	22 21 32	
	3,21	6. 9 6.61 6.28	e.c. 2.c. c.c.	5.61 6.61 5.65
radiii — alii ralia — aliii	11.10	0.20 0.20 0.18	c.c. c.c. c.c.	: : : : : : : : : : : : : : : : : : : :
	11 - 3.00 - 335	263 31 644.	11	,
		22 0.000 0.247	0.03	

. . .

東京 ない

** ** .

		10.40.3	. 461						c ar ol.	://.i	
in the second se	.66125 [] 1 017 [] 1 017	822210 4 001 31 2 041 3	200 PC 027 I CAT I	CAT 2 C	AN 17 3 : CA	SPANISH AT 1 CA	T 2 CAT	3 T CAT 1 2 CAT 1	0.11 SFL 0.11 2 0.41 2	1	
Caraconics - 1 caraconics	1745.24N 8: 	2 CA1		LS . 12 L	21 3 64	1 1 6	1 2 6 7	CIR.A 3 CAT 1 3 CAT 1		/ 1	73
	11777	35	2.35	1.17 4	3450 5.25 3	1.61	.14 (.5	4 0.11		: 1 : 2 : 1	
	- :::::		c.sl -	:::	5.15 — s	.c2 - c	çş c. :	1 6.23		-:::	
		3 91	:0.2. :-:-::::::::::::::::::::::::::::::::		12	2			3.13 3.13 3.23 3.33 3.25		
		·						·			
	***										_
										¿	
										302	_

SCHOOL DISTRICT 14, EROCHLYN

BIO COUTH FIRST SYRUTT DROOKLYN, NEW YORK 11211

DISTRICT FOURTEER'S HEBREW DAY SCHOOL LANGUAGE DATA SURVEY TOTAL TOTAL NON-ENGLISH PERCENTAGE OF

<u>ясноот.</u>	. ERROLIMENT	TOTAL NON-ENGLISH POMENANT	PERCENTAGE OF N-E DOMINANT
Yeshiva Arugath Habasem	260	208	80%
Ahavas Yisroel-Yeshiva	420	315	75%
Yeshiva Peth Yeshaya	3.10	105	75%
Yashiva Benai Mordechai	03	. 72	90%
Beth Jacob H.S.	450	135	30%
Beth Jacob Elementary	210	73	35%
Bnes Yaakov	750	525	70%
echiva Belz	250	213	85%
Enos Yerusalem	03	60	75% 🧠
Yeshiva Benai Yesoscher	100	95	95%
Yeshiva Minchas Eleiezer	120	96	80%
Yeshiva Kehilath Yaakov	600 .	510	85%
*eshiva Nesivath Olea	140	77	55%
!eshiva of Paya	150	135	90% .
Yeshiva Torah Vodaath	. 180	63	35%
eshiva Sherath Hapleita	220	154	70% .
oth Chana	180	126	79%
eshiva Shaar Hatorah	85	77	90%
eshiva Darkei Tshuva	. 90	72	80%

OFFICE OF THE SURPABLE FROSTIANS

SEREOL PERMIT 14, DROOMLYH

PAD COUNT FIRST STREET FORCESSES HEW YORK HEH

Continued:

DATABLET FOUNTEER'S BEEDSEA DAY SCHOOL MARGETON DATA SURVEY

SC.OC.	TOTAL	DOMESTICAL TOTAL T	PERCANITGE OF R-D BONGETO
			•
Yeahiv: Shewrol Badas bakashoe	210	178	85%
Yesniz: Tzewach David	150	135	90%
Yeshiva Yesədə Hatorah	320	176	55%
Yeshiya Lachlas Yaalov	400	200	50%
Adaas Yerlan	350	140	40%
Yestava Khayas Torah	110	. 88	80%
Both Rachel	2,025	1,413	70%
United Talmudical Academy	3,055	2,444	80%
TOTALS	11,095	7,890	71%

EXHIBIT "G"

OFFICE OF PRIMEDISABLE PROCESMS JA 305

CCLOOL DISTRICT M, DROUMLYN

PROCESSES, NEW YORK WAY

DISTRICT 14's NON-PUBLIC SCHOOLS

- LANGUARD DATA SURVEY

SCHOOL	TOTAL ENROLUMENT	NOR-ENGLISH DODE:MANT	% NON-ENGLISH DOMINANT
All Saints	400	152	. 38
Saint Alphonous	265	60	22
Saint Anthony	627	37	5
Saint Cecilia	750	99	13
Saints Cyril and Methodius	314	20	6
Saint Francis of Paola	307	11	3
Immaculate Conception	324	111	35
Most Holy Trinity	366	241	65
Saint Nicholas	278	133	47
Our Lady of Consolation	245	70	23
Our Lady of Mount Carme	1 377.	333	83
Our Lady of Bedford-			
Stuyvesant W.	562	289	51
Saints Peter and Paul	298	135	46.
Saint Stanislaus	905	289	. 31
Our Saviour	611	423	' 69
Saint Vincent de Paul	292	88	30
TOTALS	6,911	2,491	36%

Public School 302

Pilicard Program

65 Horroom Avenue

Prochiga, New York 11211

MARTING OF ETHEROUGH, THOSEMAN ACCOUNT CONCOTTATION MINITED (THEM VIL) OF March 32, 1974

ATTENDANCE.

Mr. John Lynch, Principal Mrs. Peverdy Pappaport, Assistant Principal Ms. Jecqueline A. Case, Program Constitution Ms. Agnes Clark, Pistelet (unright a Casadinator Mrs. Welly Pens, School and Constatey Relevious Teacher

Parentst

Maria Collado
Ana Laro
Remonita Roman
Ingelica Radiros
Matilda Hernandes
Sonta Maisonave
Angelica Ruis
Ada Perwood
Julia Valentin
Justita Novano
Incy Velez
Lydia Redrigion
Maria Cossio

- Venita Sate
 Ampuro Gustan
 Haris Melina
 Perta de Jesus
 Carmon Aquirinessi
 Isabel Coleu
 Hilegres Statiogo
 Horisan Cora
 Horisan Cora
 Horisan Cora
 Horisan Cora
 Horisan Cora
 Iluminada Padilla
 Isabel Kesarie
 Mirerya Redrigues
 Inder Rodrigues
- 1. Meeting convered at 9:00 A.M.
- 2. Discussion of meeting's purposs

To keep parents informed of program progress

Answer questions relating to the program

To consult parents shout cortain aspects of the program

3 Prief report on status of continuation proposal for 1974 - 1975

Approved by Matrict

Approved by State

- 1. La renaion commente e las 9:10 A.M.
- 2. Sonas de la remaion

Avisar los padres del pregoces del pregoces

Centestar projuctas sobre el progressa

Consultar les podres meles miertes espectos del programa

Le Un reporte bisme del catada de la piripuesta prima el ano elignicata 1974 - 1975

Aprovedo por el Districte

Aprevado der el Batalo EXHIBIT "I" tion Sequence

September - Spanish 100%

Cotober 1 - Introduction of Phatar Language I

Datoler - November - Introduction of Spanish Reading Readiness

M. verber 1 - Introduction of daily English Language omphasia lessons based on curriculum areas

January 1 - Utilization of Inglish es well as Spanish in Marh lassons

February 1 - Two core (Social studies, Schenou, Language Arts) lessons a wock in English

- 5. By February 1, the children are participating in a learning program that approximates the use of 20% English, and 50% Spanish
- 6. Puring the discussion period, the 6. Darente la discussión les pecres the parents unanimously agreed that Implish should be stressed as much as Spanish
- 7. Parents indicated the desire to talk about other grales. It was egreed to do so at Alture neetings

Hosting adjourned at 10:40 A.M.

4. Piscursion of Larguage Acquisis h. Discusion de De a tradición en perpendin (1) longuals

> Septionine - instruction or on Tol 100%

Octubre 1 - intificueción del programa de l'engage lister

Conchre - Movienbre - Introducates del apreste de lectura en espenal

Nevicibre 1 -

. ? -

Enero 1 - Use del ingles y el e gand en hatcarticon

Pobrero - los lecciones en in incles en len mons de catudies acciales F ciencias des veces en la sesent

- 5. Para el primoro de febrero les ninos estan participando en un progress que aprominara el ues de 50,1 ingles y 50% do . espanol.
- enturieron unamines en que se debien emplear ember idienas con igual enfente.

Los padres expression sa dense de hablar sobre otros grados. Se acordo hecorlo en reuniones Suturas.

La reunion concluys a las 10:40 Adle

Finates of PUTCHORD Larent Maching April 23, 127h

PRICEAT: John J. Jynon, Principal, Jacqueller H. Drey, Walle VV. Filingual Resting Nella Fela, Teacher in John ob-Community Relations Hery Audifica + P.T.A. Legident

1. Jumine's Palling

3. Hargarita Pivera

5. Julia Valortin

7. Gloria Pavetro 9. Polecita Run

11. Garten Vege

23. Berts De Jeros

2. Junita Octia

h. Ava Gues

6. Sort Soto

8. Lyca Rodrigues

1'. Davie Rodricter

J. . Iveda Rodricuez

The Theodora Martines

The Meeting was called to order at 9:30 A. M.

- 1. Mics Case gave a progress report on the status of the 1974-1975 proposal. It is boing reviewed in Vashington and no further information is available.
- 2. Mr. Iwach epoke about school pictures. There will be a new photographer in. May due to difficulties with the first photographer running out of film, not taking all the pictures, etc.
- 3. The parents were informed of the progress in the interdesing and requesting of billingual teachers for new year's classes.
- h. Mr. Lynch spoke about P.S. 380K the contact for building is on the Board of National calcular for May, and a letter was written to Mr. McClarran by Mr. Lynch and we were informed that construction would begin in June.
- 5. The furnity room is available to all parents. The family worker is available to bely parents, but the electron that she must complete.
- 6. Mics Case showed the parents the new books that have gone into each classroom in the Billingual Program, including teacher-information books on billingual education.
- 7. There was a discussion on pupil mobility: when children in bilingual class move out of the school, who should take their place? The parents expressed concern that each child who is in a bilingual class remain. They were reassured that this was just a discussion and no decision would be made that morning. We speke about departmentalizing for Spanish language arts within the two classes, departmentalizing the entire grade for Spanish language arts, a Spanish cluster teacher.

The meeting was adjourned at 11:00.

El remaios començo a Jan 9:30 / M.

- 1. La caposité dese clo paracrée del cardo de la provincia i llibre au Vel et percente 1971-75. I sun en le crimina de catencier en faultiques. Da les nimitations de la catencier.
- 2. El refler lynch hablé de los retre tos de la escuela. Venos a tener un circ fotegrafo porque había muendo cáficultades con el primero.
- Los pedeca estaben, avisados del preprogreso de los intrevistos y las colicit des de las necesses billaques para el proximo año.
- h. Mr. Byrch habld de P.S. 380E -

cl contracto de equatrucción está estre el calandado del Jesus de la mate de may, y se cacribio una carta el sebor Hadlarren y nes avisa que l'estat recien ve a espetar en justo.

- 5. El culón de Padres es para todos los padres. La family verbor o une que agudar todos los padres paro tambien tache responsabilidades en el milla de elect.
- 6. Miss Came empeño los libros nuevos a los padres quo están en culo ralon de clasa del progresa cillingos, incluyendo libros de información de massiros que trava as educación billingos.
- 7. Habia un discussion de la mobilicación de estudientes; exendo miles salen del programa bilingua quien debe temar el sitio? Los padres expreseron inverte que cada mile que esta en el programa queda en el programa.

Estaban asegunados que esclamente era una discusión y que minguna decisión sera hecho cata nafiona.

Habiahanos de un deport for las classes de espeñol entra los 2 grades, de tener una maestra de al para las 2 clases del grade-un gampe.

La rennion tormini a las O A.M.

PARENT AND COMMUNITY INVOLVEMENT CONSONENT

Those individuals involved in the pre-planning stages of this project expressed the view that community participation should be considered a critically important aspect of the program.* As has been noted earlier, the lasticic community has traditionally veered away from the creation of educational programs of this kind. Therefore, the proposal itself represents a significant departure in the prevailing educational philosophy.

It is recognized that in order to gain widespread approval for the concept of bilingual education, the advantages of the program must be demonstrated to individual parents and community members through their active participation in all aspects of planning and implementation. It is also clear that parental involvement will further the educational opportunities and achievements of the children:

[#] See Page 35 for the composition of the Community / lvisory Group.

Parent and Committe Payabage of Component - Performance Chiectives

Product: Create a more positive stritude towards Yiddich-English bilingual Education on the past of parents and community penbers. Parents will exhibit a greater desire to expend the bilingual progress to include greater numbers of children.

Process: Parents and community numbers will be encouraged to engage in all espects of the project including workshops, classroom activities, the perent advisory committee, and perent-tencher conferences. Paraprofessionals and facily workers will be recomited from the community.

Instrument: The project staff will a intain a detailed record of all parent activities. This record will include the names of all of the parents and community numbers who participated, and indicate what their reactions were to their experiences.

Product: A Yiddish-English bilingual adult-education program will be planned and ultimately established.

Process: Parents and community members will be encouraged to take part in the planning of an adult education program. If sufficient interest is shown, such a program will be developed and implemented.

Instrument: Oral interviews and questionnaires distributed throughout the consumity will determine whether there is sufficient interest for an adult education program at this time.

COMMUNITY ADVISORY COMMITTEE

WASI .	ADDRESS	TRANSPORT	PARENT OF	THOSONY PRACTICIPANT
Doutsch, S.	557 Bedford Avenue	782-0925		Yes
Feldman, S	113 Hewes Street	834-9414	•	Yes
Fewerwerker, A.	195 Division Avenue	732-5413		Ÿos
Glanzer, L.	299 Marcy Avenue	384-6090		Yes .
Klagsbald	172 Rutledge Street	387-3042	. ,	Yes
Landau	185 Hooper Street	287-3170		Yes
Nojowitz, A.	153 Wilson Street	384-0647		Yes
Schwartz, Jeno	192 Hewes Street	384-2723		Yes .
Shenwald, Y.	180 Hooper Street	337-2733		Yes
Steinberg, M.A.	273 Rutledge Street	963-2942		Yes
Tirnauer, Y.B.	558 Bedford Avenue	384-7502		· Yes
Weiss, G.	253 Penn Street	782-6935		Yes .